

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

CAMPBELL SOUP

EPA SITE NUMBER: CAD009198367

SACRAMENTO, CA

SCORED BY: FREDRICK MOORE

OF H-3-2, HWMD, EPA R9

ON 03/31/92

GROUNDWATER SCORE : 41.46

SURFACE WATER SCORE: 0.45

AIR ROUTE SCORE : 4.58

ONSITE SCORE : 0.00

MIGRATION SCORE : 20.86

Low

EPA ID NO. : CAD009
CAMPBELL SOUP

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: TRICHLOROETHENE

TOXICITY/PERSISTENCE VALUE: 12

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:	0
DRUMS :	0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.5

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N
IS THERE A PERMITTED OUTFALL? Y
HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER
24-HOUR RAINFALL: 2.0
DISTANCE TO SURFACE WATER (MILES): 1.25
PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F003
TOXICITY/PERSISTENCE VALUE: 6
QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

SURFACE WATER USE: QUALITY NOT IMPACTED BUT WITHIN THREE
DISTANCE TO INTAKE OR CONTACT POINT (MILES): 1.5
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.5

EPA ID NO. : CAD009
CAMPBELL SOUP

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N
DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y
HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY
CAN CONTAMINANTS MIGRATE INTO AIR? Y
CONTAINMENT: VERY GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: F003
TOXICITY/PERSISTENCE VALUE: 2
QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE SMALL

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.1

EPA ID NO. : CAD009
CAMPBELL SOUP

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BENZENE

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.10

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 18, 1991

Mr. Osman M. Aly
Campbell Soup Company
Camden, NJ 08103-1799

Re: EPA ID# CAD009198367, Campbell Soup Company, Sacramento CA

Dear Mr. Aly,

This letter is to acknowledge receipt of your comments, dated November 14, 1991, on the RCRA Preliminary Assessment completed by EPA's contractor, Ecology & Environment. The comments will be added to your facility's file and taken into consideration, as appropriate, when determining whether EPA action is necessary at your facility.

If you have any questions or concerns, please call Nancy Nadel, of my staff, at (415) 744-2043.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Lindsay", is written over the typed name.

Nancy Lindsay, Chief
Corrective Action Section
H-4-4

Campbell Soup Company
LEGAL DEPARTMENT
CAMPBELL PLACE
CAMDEN, NEW JERSEY 08103-1799

NORMA B. CARTER
ASSISTANT GENERAL COUNSEL

TELEPHONE (609) 342-3934
TELEFAX (609) 342-3936

October 28, 1991

FEDERAL EXPRESS

Nancy Lindsay, Chief
RCRA Corrective Action Section
U.S. Environmental Protection Agency
Region 1X
76 Hawthorne Street
San Francisco, California 94106

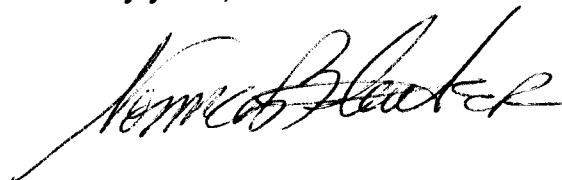
Re: EPA ID # CAD 990 198 367

Dear Ms. Lindsay:

In response to your letter dated October 15, 1991, please be advised that we do not wish to make any claim of confidentiality. However, as we discussed, we believe that certain of the statements in the report are inaccurate. We are gathering the information and will be responding as soon as possible. In the meantime, we would appreciate your advising anyone who requests the report either that it is a draft or that Campbell Soup Company is contesting various statements made in the report.

Thank you very much for your assistance

Sincerely yours,



NBC/kwh

cc: Dr. Osman Aly

Campbell SOUP *Company*

CAMDEN, NEW JERSEY 08103-1799

November 14, 1991

Ms. Nancy Lindsay, Chief
RCRA Corrective Action Section
US EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

**RE: EPA ID #CAD009 198 367
RCRA Preliminary Assessment
Campbell Soup Company
Sacramento, California**

Dear Ms. Lindsay:

This is in response to your letter of October 19, 1991 concerning the Ecology and Environment, Inc.'s Preliminary Assessment report for Campbell Soup Company's Sacramento, California plant.

As we indicated in our telephone conversation, our review of the report revealed several serious inaccuracies and some incorrect information that need to be corrected. Our major concern is that the report as presented may influence EPA's decision on future actions related to the site.

The following is a list of the specific sections of the report for where corrections and/or comments are provided: (The statements to be corrected are reproduced from the original report and are highlighted for clarity.)

1. Statement, Page 4, third paragraph:

Other hazardous wastes generated at the site include spent batteries, Vedeo Jet Ink, asbestos, tank-bottom wastes (i.e., salt impurities that settle out in the facility's salt brine system), and polychlorinated biphenyls (PCBs). For further information about the generation and storage of these wastes, refer to section 4.1 (4).

Comments:

Change ", and polychlorinated biphenyls (PCBs)" to:

, and sealed light ballasts containing polychlorinated biphenyls (PCB).

Ms. Nancy Lindsay, Chief

November 14, 1991

Page 2

2. **State, Page 4, third line from bottom:**

were observed at Transformer Substations 2 and 9. A tar-like residue was observed under a transformer drain valve located at Substation 6. A sample of the residue was taken; however, results of the sampling could

Comments:

The statement implies that "a tar-like residue was observed" at the time of inspection by E & E FIT. the statement should read:

Also at that time, a tar-like residue was observed....

3. **Statement, Page 6, Section 3.5, third paragraph, line #7:**

not have lids. County Health issued a permit to the facility, in approximately 1988, for one 1,000-gallon underground product Stoddard solvent tank. County Health inspects

Comments:

Change to:

, for one 4,000 gallon underground....

4. **Statement, Page 7, Section 4.1, fourth paragraph:**

Waste Managed: Spent solvent-based and water-based enamels, spent solvents, waste oils, spent batteries, spent Vedeo Jet Ink, and PCBs are stored in the hazardous waste storage area (2,4,17).

Comments:

Change, and PCBs to:

....., and sealed light ballasts containing PCBs.....

5. **Statement, Page 8, first paragraph:**

Light ballasts containing PCBs are collected in a 35-gallon drum which is stored in the hazardous waste storage area, prior to being transported off site to Kettleman Hills (4).

Comments:

The PCBs in the light ballasts cannot physically migrate or spill to create a threat to human health and the environment. Therefore, the first sentence should read:

Light ballasts consisting of sealed metal boxes containing PCBs.....

6. Statement, Page 8, Section 4.2, second paragraph:

There are two caustic tanks on site: one 4,000-gallon tank and one 5,000-gallon tank. These tanks are used to store sodium hydroxide and chlorine which the facility receives in bulk quantity. These tanks are

Comments:

Change, and chlorine....to:

, and sodium hypochlorite....

7. Statement, Page 9, first paragraph:

operations was approximately seven drums. Except for a report describing the burial of two drums in the area south of the 4th shift Maintenance shop (250 feet southeast of No. 2 deep well), there are no other records describing disposal practices (32).

Comments:

The highlighted statement is **INCORRECT** and the reference cited (#32) does not describe anywhere the burial of any drums on the site. The reference describes disposal practices of TCE that was used for degreasing operations. The spent TCE from two drums was apparently disposed on the land (spread on the land surface) in the area described. However, the reference cites that the area where the disposal took place was thoroughly investigated by soil borings to a depth of 20 feet and the laboratory results indicated no evidence of TCE contamination.

Reference 32 is shown in Appendix 1, and the following is a direct quote of the apparent TCE land disposal:

Except for one vague recollection of two drums being land disposed in the area south of the 4th shift Maintenance shop (250' southeast of No. 2 deep well), there are no other records describing disposal practices.

Therefore, the statement in the E & E FIT report should read:

Apparently, TCE from two drums might have been land disposed in the area south of 4th shift maintenance shop (250 feet southeast of No. 2 deep well). Subsequent investigation of the soils in that area by borings 20 feet deep did not reveal any TCE contamination. There are no other records describing disposal practices (32).

8. Statement, Page 9, fourth paragraph:

Contaminated soil may still exist on site as a result of the 1987 spill that occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product (see section 5.2 for details concerning the spill (12). Although the underground tank was removed in 1989, and some contaminated soil was excavated, it is unknown to FIT if the excavated area was extensive enough to result in a complete cleanup (13).

Comments:

There is no factual basis for stating that contaminated soil may still exist on site as a result of the 1987 spill. FIT reports that "Although the underground tank was removed in 1989, and some contaminated soil was excavated, it is unknown to FIT if the excavated area was extensive enough to result in a complete cleanup (13)". This latter statement contradicts the facts presented in reference 13, a copy of which is shown in Appendix 2.

The cited reference (#13) states that "Approximately 1,000 cubic yards of contaminated soil has been removed from the excavation. The size of the excavation is approximately 36 ft. x 36 ft. x 20 ft. deep." Therefore, substantial volume of contaminated soil have been removed.

Board (RWQCB) has been in effect for over two years. Prior to initiation of work a work plan was prepared and reviewed by the Board. Approximately 1,000 cubic yards of contaminated soil has been removed from the excavation. The size of the excavation is approximately 36 ft. x 36 ft. x 20 ft. deep. The concrete pads located ten and twelve feet

In addition, the results of the soil sampling reported in the same reference state that "Samples nos. were collected at the boundaries of the excavation. The absence of detectable contamination in these samples confirms that all contaminated soil has been removed."

once in the analyses. Benzene was not detected above its reporting limit in any of the samples. Sample nos. 1, 8, 14, 15, 16, 17, 18, 19, 20, 21 and 22 were collected at the boundaries of the excavation. The absence of detectable contamination in these samples confirms that all contaminated soil has been removed.

Finally, the conclusions and recommendations in that report (reference #13) state that:

Conclusions and Recommendations

The sampling results indicate that all contamination has been removed from the tank site. AEMC recommends backfilling the excavation as soon as possible to minimize the safety hazard due to an open excavation.

Based on the above discussion, the fourth paragraph on Page 9 should be deleted and/or corrected to reflect the fact that all the contaminated soils that resulted from the leaking pipe connected to an underground tank containing solvent-based enamel product have been removed from the site.

9. **Statement, Page 10, first paragraph, fourth line from the bottom:**

Oaks formations (34). The regional groundwater gradient is predominantly in a southeasterly direction. Depth to groundwater at the site is approximately 50 feet. The underlying soils at the facility are predominantly medium to fine silty sands with discontinuous lenses of clayey silts and coarse gravels (5,12).

Comments:

The depth to the groundwater shallow aquifer is approximately 50 feet. However, drinking groundwater supplies draw water at depths ranging from 300 to 500 feet and are separated from the shallow aquifer by defined confining layers.

10. **Statement, Page 10, second paragraph:**

It appears that hazardous substances from the site have been released to groundwater. During 1987 and 1988, as part of a regional groundwater contamination study, County Health and RWQCB sampled four water supply wells on site. Analytical results of these efforts identified up to 4.8 micrograms per liter ($\mu\text{g/L}$) TCE in the on-site water supply well #2, which is located hydraulically downgradient of the processing plant. TCE has not been detected in three other on-site water supply wells which are located hydraulically upgradient of the processing plant. The four water supply wells are screened at comparable levels ranging from 100 to 400 feet below ground surface (9). TCE was used at the facility for parts cleaning until September 1984 (10). In addition, two drums of TCE may have been buried 250 feet southeast of water supply well #2 (11).

Comments:

There are no facts presented to support the statement that hazardous substances from the site may have been released to groundwater. The facts are that TCE was detected at a level of 4.8 micrograms per liter ($\mu\text{g/l}$) in the on-site water supply well #2. TCE was not detected in five other on-site water supply wells which are located hydraulically upgradient of the present plant. The source of TCE in well #2 could possibly be an outside source and because the detected level of TCE was below the maximum contaminant level of 5 $\mu\text{g/l}$ for drinking water, we did not proceed to investigate the possible outside source.

The statement that TCE was used at the facility for parts cleaning until September 1984 does not provide all the facts presented in the cited reference #10. The cleaning operation, as presented in reference #10 and reproduced here in Appendix 1, was conducted in a contained metal structure that was placed on an impervious asphalt paved area. The likelihood of groundwater contamination from this source is obviously remote if not impossible.

The statement that two drums of TCE may have been buried 250 ft. southeast of water supply well #2 is incorrect and this issue is discussed in paragraph #7 of this letter. Essentially, no drums are or were buried on the site, and the suspected area where TCE may have been land disposed had been investigated and no contamination was detected. These facts are presented in reference #32 of FIT report and is reproduced here in Appendix 2. In addition, the suspected area is located 250 feet southeast of well #2 or downgradient from the well since the groundwater flow in the area is in a southeasterly direction.

Based on the above discussion the paragraph in the FIT report reproduced above should be changed to reflect the facts only. That is, TCE at 4.8 $\mu\text{g/l}$ was detected at well #2 and the source of contamination is currently unknown.

11. Statement, Page 10, third paragraph:

In 1987, a spill occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product. Campbell Soup repaired the pipeline and leak-tested the tank and pumping equipment. Thirty cubic yards of contaminated soil were excavated and transported to a Class I disposal facility. The excavated area was then resurfaced with cement. Six monitoring wells were then installed in the area where the pipe leak had occurred. During the drilling of monitoring well MW-1, soil samples were collected and the analytical results indicated the presence of benzene at 250 micrograms per kilogram ($\mu\text{g/kg}$), ethyl benzene (68,500 $\mu\text{g/kg}$), toluene, 2 $\mu\text{g/L}$ ethyl benzene, 1.6 $\mu\text{g/L}$ trichloroethane (TCA), and 1.6 $\mu\text{g/L}$ tetrachloroethene (PCE) have been detected in groundwater samples collected from monitoring wells MW-1 and MW-2 (12).

The above statement does not represent all the facts presented in the cited reference #12 nor does it present the subsequent actions taken to address the soil contamination as a result of the leaking pipeline.

The conclusion presented in reference #12 is reproduced in Appendix 3 and indicate the possibility that minor quantities of enamel coating were inadvertently carried from the soil contamination zone (5 to 20 foot depth) to groundwater during construction of MW-1 in December 1986 located directly under the enamel tank pump area. The conclusions also indicate that the concentrations present in MW-1 apparently do not pose significant threat to public health or environment. MW-7, located about 40 feet and downgradient from MW-1, was free of contamination.

In addition, reference #12 presented soil and groundwater investigation conducted in 1987 in relation to the pipeline leak. Subsequently in 1989, the four enamel and thinner tanks were closed and removed, along with piping and other appurtenance. At the same time, the remaining contaminated soil in the tank area was excavated. Three additional soil borings were drilled and sampled to verify all contamination was removed. The activities are described more fully in reference #13 of the FIT report and is reproduced here in Appendix 2. In July 1989, Campbell requested from the California Regional Water Quality Control Board (Appendix 4) to discontinue the groundwater monitoring program related to that leak since no contaminated soil remained on site and the results of the groundwater monitoring indicated that the contamination was almost completely dissipated.

12. Statement, Page 11:

Section 5.4, last sentence, "In addition, contaminated soil is located beneath pavement" should be deleted for the reasons discussed above.

Section 5.5:

Last sentence in the first paragraph, "In addition contaminated soil located beneath pavement" should also be deleted.

CONCLUSIONS:

In conclusion, we recommend that the E&E FIT report and specifically the HRS considerations to be reevaluated in light of the facts presented in this letter. The Solid Waste Management Unit (SWMU) at the site does not pose any threat(s) to human health and the environment since it is contained in a dedicated building with concrete (impervious) floors and is provided with appropriate containment to prevent release of any accidental spills. The reported release of hazardous materials at the site as presented in the FIT report was properly addressed by Campbell under the

Ms. Nancy Lindsay, Chief
November 13, 1991
Page 8

guidance and approval of the appropriate state agencies (RWQCB and DHS) and is not related to the SWMU. Specifically, the leakage of solvent from the piping associated with enamel and solvent underground storage tanks was addressed by implementation of appropriate remedial measures including removal of the tanks and the piping system, excavation of the contaminated soil and monitoring of the soils and groundwater. As a result, there is no reason to believe that the tank system had ever significantly affected groundwater, since clean soils were encountered at approximately 15 to 20 feet deep and groundwater was approximately at about 50 feet deep. The inference in the FIT report of possible impacts of this incident on the three municipal drinking water systems located within 4 miles of the site (page 13) is not substantiated by the facts. One of these public systems is located upgradient from the site, another system is located seven miles away. In addition to the fact that the above incident did not result in groundwater contamination of the production wells at the site, all the public water supply systems draw water from a deep aquifer which is 300 - 500 feet deep and is generally separated from the upper aquifer by several confining layers.

We would appreciate your response to this letter and if you feel it appropriate we would be glad to discuss this issue in a meeting with you and/or your representatives. Please contact me at (609)486-3023 if you have any further questions.

Sincerely,

CAMPBELL SOUP COMPANY

A handwritten signature in black ink, appearing to read 'Osman M. Aly', written in a cursive style.

Osman M. Aly, Ph.D
Director - Environmental Affairs

/sg\0382

cc: Ms. N. B. Carter
Mr. R. Cook
Mr. D. R. Lanning
Mr. R. F. Zane

APPENDIX 1



* * * * *
6200 FRANKLIN BLVD.
SACRAMENTO, CA 95824-3499

August 15, 1988

Mr. Larry Nash, Senior Engineer
California Regional Water Quality Control Board
Central Valley Region
3443 Routier Road
Sacramento, CA 95827-3098

Subject: Campbell Soup Company, Ground Water Supply Wells
Investigation, Sacramento County

Dear Mr. Nash:

In reference to your letter on the above subject, the following information is presented as a site evaluation survey of the degreasing operation at the Sacramento Plant. All of the information was obtained by making inquiries of plant personnel who have knowledge of the degreasing operation.

I. Plant Degreaser

Operating Procedures (See Sketch SKD-4448.)

The degreaser was approximately 12' long, 5' wide, by 6' high. There was a steam jacket in the bottom of the tank with a cold water jacket 18" from the top of the degreaser. A blower would exhaust the cooled gases from the degreaser. During operation, the lid of the degreaser would be closed. Inside the tank, the water jacket would condense the solvent vapors and the liquid would flow into the holding tank.

To degrease machine parts, a drum of 55 gallons of TCE was dumped into the tank and the steam would be turned on to heat the solvent. The heated solvent would clean the parts. The major portion of the evaporated solvent would return to the holding tank after being condensed by the water jacket.

After the parts were degreased and still in the tank, the parts would be sprayed with solvent from the holding tank.

When the degreasing operation was completed, all of the solvent left in the degreaser would be pumped out into a 55-gallon drum for storage and reuse during the next cleaning operation.

Mr. Larry Nash
August 15, 1988
Page 2

Material Usage

The annual usage of TCE for degreasing operations was approximately seven drums.

Disposal Methods

Except for one vague recollection of two drums being land disposed in the area south of the 4th shift Maintenance shop (250' southeast of No. 2 deep well), there are no other records describing disposal practices. The area in question was very thoroughly investigated by soil borings to a depth of up to 20 feet. Laboratory results indicated no evidence of TCE.

Plant Locations

Location 1 - The first location for the degreaser was west of our screening plant. It was placed on an asphalt area. The area drained into a storm ditch. (See Sketch SKD-4450.)

Location 2 - The last location was at the bottom of the ramp into the Container Department, south side (Building W-7A). The degreaser was located at two places, one on either side of the ramp. This area drained into the plant sewer system. (See Sketch SKD-4449.)

II. Bimonthly Sampling of No. 2 Deep Well

A sample was taken on July 25, 1988 and sent to our laboratory in Camden, New Jersey for testing. Results will be forwarded to you upon receipt.

If you have any further questions, please call me at 395-5027.

Sincerely,

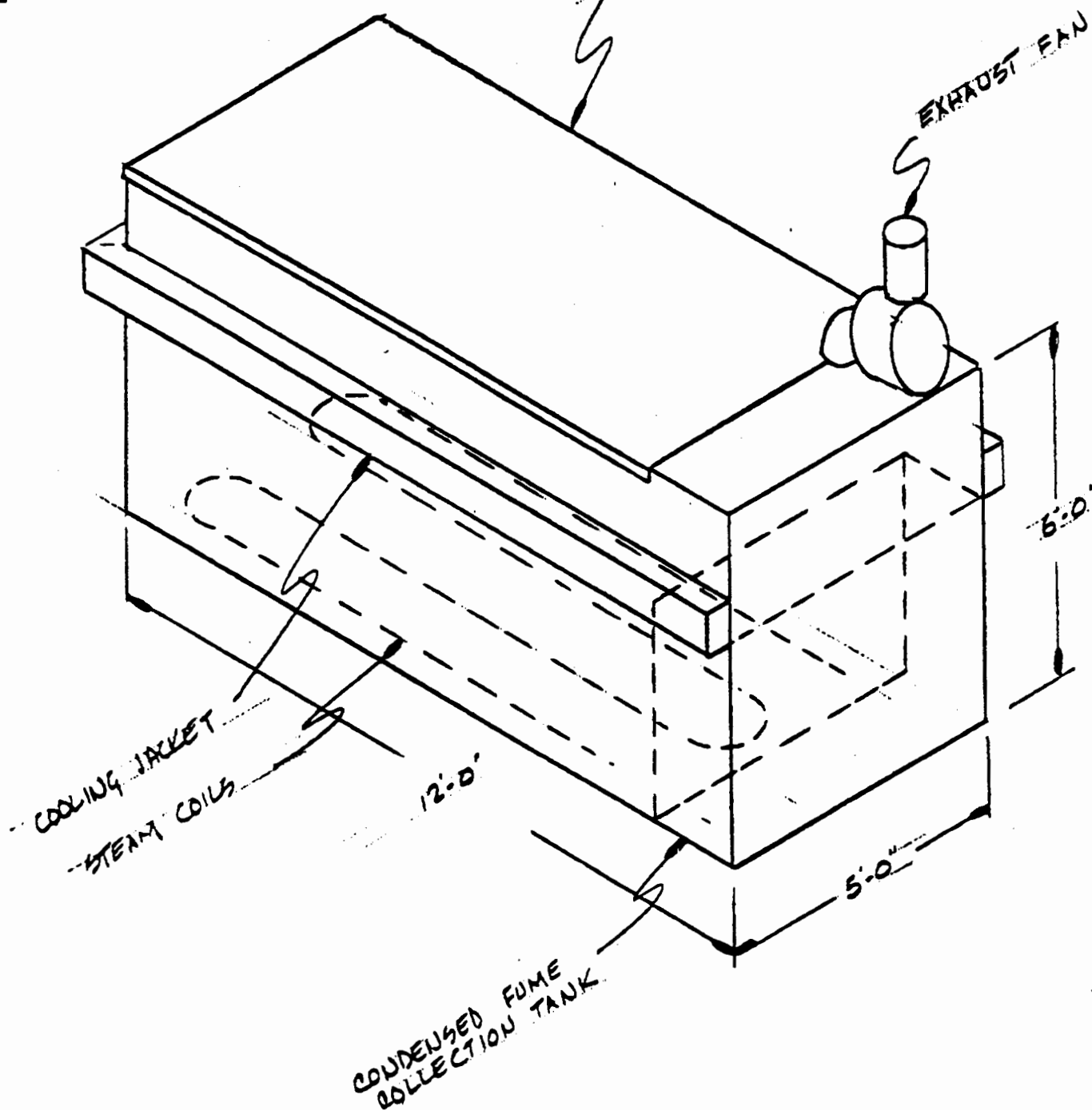
CAMPBELL SOUP COMPANY


D. J. Sinclair
Project Engineer

DJS/jb
Enclosures (SKD-4448,49,50)
cc: T. Duwa
D. Lanning
R. Locke
J. Staszewski

E. Gillis - American Environmental Mgt. Corp.

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 work.



PROJECT NO.

JOB FOLDER NO.

BILL OF MATERIAL

SPECIFICATION

DETAIL DWGS.

REFERENCE

LET.	DIR.	DATE	BY	DESCRIPTION OF REVISION	ZONE
				DEGREASER	

CAMPBELL SOUP COMPANY

ENGINEERING DEPT. SACRAMENTO, CALIF.

DATE 8-15-88

SCALE None

DRAWN JENKINS

CHECKED

SKD 4448

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(23)

(21 1/2)

CAN PLANT W-7

TT

SUB-STATION #11

SUB-STATION #9

RAMP

DEGREASER
LOCATION #2

SLOPE

XX

VV

FLOOR DRAIN

PROJECT NO.

JOB FOLDER NO.

BILL OF MATERIAL

SPECIFICATION

DETAIL DWGS.

REFERENCE

LET.

DIR.

DATE

BY

DESCRIPTION OF REVISION

ZONE

DEGREASER - BLDG W-7

CAMPBELL SOUP COMPANY

ENGINEERING DEPT. SACRAMENTO, CALIF.

DATE 8-15-89

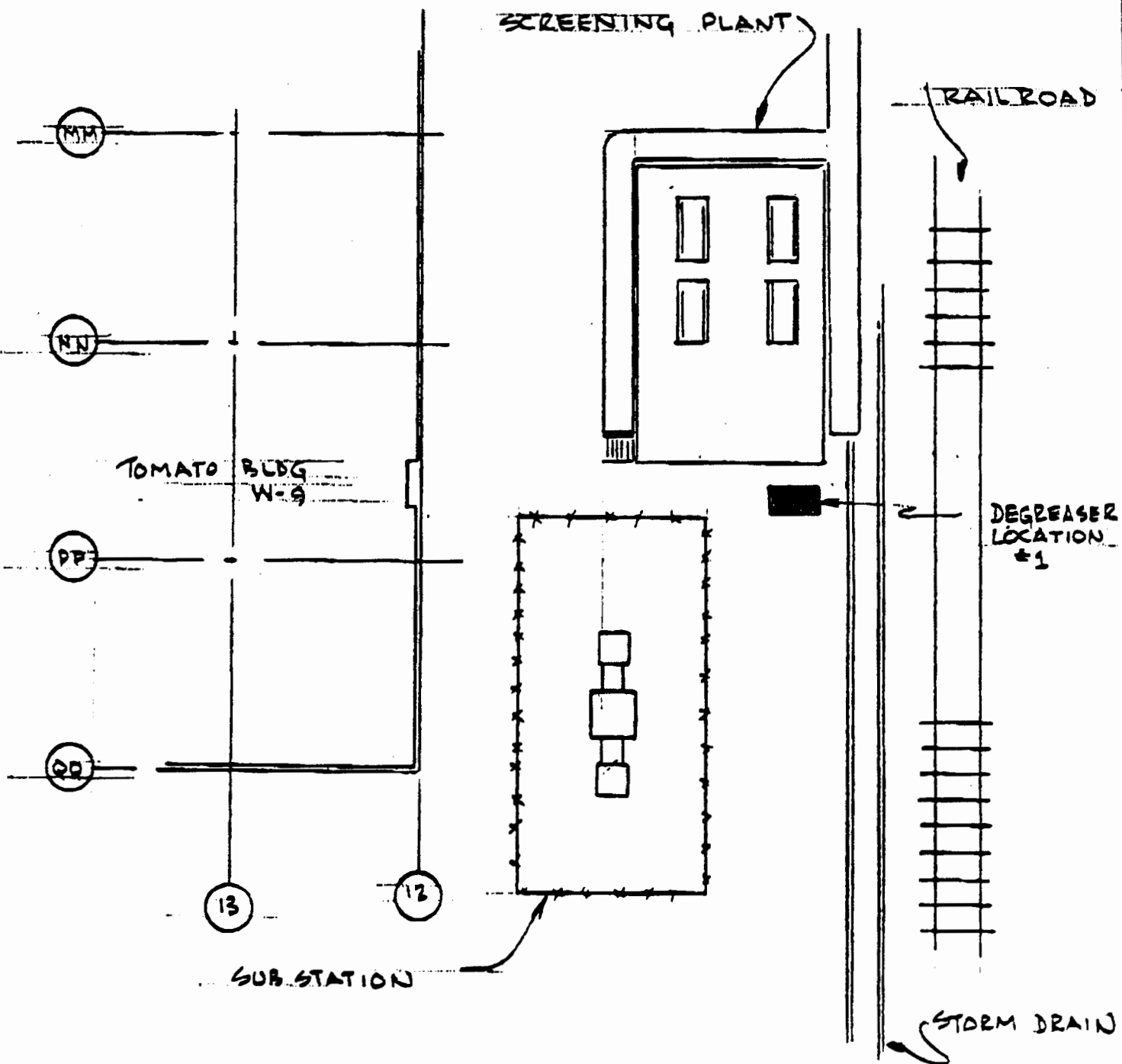
SCALE NONE

DRAWN JENQUINO

CHECKED

SKD 4449

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 work.



PROJECT NO.

JOB FOLDER NO.

BILL OF MATERIAL

SPECIFICATION

DETAIL DWGS.

REFERENCE

LET.

DIR.

DATE

BY

DESCRIPTION OF REVISION

ZONE

DEGREASER - SCREENING PLT.

CAMPBELL SOUP COMPANY

ENGINEERING DEPT. SACRAMENTO, CALIF.

DATE 8-15-88

SCALE N/A

DRAWN J. J. J. J. J.

GVD 4150

APPENDIX 2

Please Refer to:
AEMC Job No. 81160

21 June 1989

Ms. Laura Campbell
Sacramento County, Environmental Health Division
8475 Jackson Road Suite 230
Sacramento, California 94826

**RE: UNDERGROUND STORAGE TANK REMOVAL
AT CAMPBELL SOUP COMPANY, 6200 FRANKLIN BOULEVARD,
SACRAMENTO, CALIFORNIA**

Dear Ms. Campbell:

On behalf of Campbell Soup Company, American Environmental Management Corporation (AEMC) submits the following information for you review.

Background

During the first week of May, 1989, four underground storage tanks were closed and removed at Campbell Soup Company, 6200 Franklin Boulevard, Sacramento. The tanks previously contained enamel and/or thinner used in manufacturing food cans. Refer to Appendix 1 for the material safety data sheets for the products. The enamel contains both light and heavy petroleum aromatics. The thinner is composed of xylenes primarily. The piping to one of the enamel tanks is known to have leaked. A groundwater monitoring program issued by the Central Valley Regional of the Regional Water Quality Control Board (RWQCB) has been in effect for over two years. Prior to initiation of work, a workplan was prepared and reviewed by the Board. Approximately 1,000 cubic yards of contaminated soil has been removed from the excavation. The size of the excavation is approximately 36 ft. x 36 ft. x 20 ft. deep. The concrete pads located ten and twelve feet below the surface which had anchored the tanks were removed during the course of excavation activities. Mr. Peter Haase of the RWQCB has inspected the site during the excavation activities and has been kept informed of all developments.

At this time, the excavated soil is stockpiled at the location shown on Figure 1. The soil is both underlain and covered by Visquene pending implementation of aeration activities. A proposal to aerate the contaminated soil has been forwarded to the Air Pollution Control Board. The closest property lines is 800 feet to the West. The entire facility is fenced and all traffic enters through one gate which is under guard 24 hours a day.

Sampling

Soil samples were collected after filling the backhoe shovel from the desired location in the bottom of the excavation. A large solid chunk of soil was chosen for sample collection. Using a hand trowel, outer six inches of soil was rapidly scraped away. The sampling tube was then driven into the native soil with a rubber mallet. The tube was then removed full of soil, the ends covered with aluminium foil, capped with plastic end caps, sealed with black electrical tape or silver duct tape and labeled. Once the sample was sealed and labeled, it was stored on ice. The samples were then delivered under chain of custody to AEMC's state certified laboratory.

Ms. Lura Campbell
21 June 1989
Page 2

Soil samples were also collected in the area of the railroad trucks to determine if contamination had spread to the track area. These samples were obtained with a drilling by driving a California split spoon sampler to the desired depth. The sampler is lined with brass tubes. Once the brass tubes are retrieved from the sampler the samples procedures described above are followed. Refer to Figure 2 for Soil Sampling Locations.

Results

Soil samples were analyzed for benzene, toluene, xylenes, and ethylbenzene (BTXE); and for total petroleum hydrocarbons (TPH) by AEMC's Certified Laboratory. The analyses are summarized in Table 1. Refer to Appendix 2 for complete laboratory results. Xylenes and ethylbenzene are the major contaminants in the soil, with toluene being detected only once in the analyses. Benzene was not detected above its reporting limit in any of the samples. Sample nos. 1, 8, 14, 15, 16, 17, 18, 19, 20, 21 and 22 were collected at the boundaries of the excavation. The absence of detectable contamination in these samples confirms that all contaminated soil has been removed.

Conclusions and Recommendations

The sampling results indicate that all contamination has been removed from the tank site, AEMC recommends backfilling the excavation as soon as possible to minimize the safety hazard due to an open excavation.

The proposed backfilling will proceed as follows. The broken concrete from the tanks anchor pads that is currently stockpiled adjacent to the site will be spread on the bottom of the excavation. The hole will clean imported fill, possibly pea gravel to approximately 5 feet below grade. The remainder of the backfilling will be accomplished with the aerated soil when aeration is complete.

AEMC requests approval to backfill the excavation in accordance with the procedures outlined above. AEMC will also request the approval of the RWQCB before commencing any action. You will be kept informed of all activity on this project. AEMC will contact you shortly to discuss the proposal.

Sincerely,

Elizabeth Gillis
Project Manager
Engineering Division

EG/ef
11cam-06 (eg)

cc: Mr. Peter Haase, RWQCB
Mr. Doug Sinclair, Campbell Soup Company

TABLE 1
ANALYTICAL RESULTS OF SOIL SAMPLES

Campbell Soup Company
Sacramento, California

May 1989

Results

Sample No.	AEMC ID #	Depth (feet)	Benzene (ppb)	Toluene (ppb)	Xylene (ppb)	Ethyl benzene (ppb)	TPH (ppm)
1	Cam-1C	11.0	<10	<10	<20	<10	<10
2	Cam-1D	11.0	<500	<500	2,800	1,800	1,600
3	Cam-2C	11.0	<50	<50	2,400	1,800	1,600
4	Cam-2D	11.0	<500	<500	6,700	5,100	2,800
5	CS-3A	11.0	<1,000	<1,000	4,000	1,800	2,700
6	Cam-3B	11.0	<10	<10	250	<10	54
7	CS-4A	11.0	<500	<500	11,000	600	850
8	Cam-4B	11.0	<10	<10	<20	<10	<2
9	Cam-BF-1	--	<2,000	<2,000	110,000	<2,000	18,000
10	Cam-BF-2	--	<20	640	50,000	1,900	2,800
11	Cam-SS-A	11.0	<1,000	<1,000	50,000	4,800	2,900
12	CS-SS-B	10.0	--	--	--	--	270
13	CS-SS-C	13.0	--	--	--	--	9,000
14	CS-B5-B	15.5	--	--	--	--	<2
15	CS-B5-C	20.5	--	--	--	--	<2
16	CS-B6-B	15.5	--	--	--	--	<2
17	CS B6-C	20.5	--	--	--	--	<2

TABLE 1
(continued)

Sample No.	AEMC ID #	Depth (feet)	Benzene (ppb)	Toluene (ppb)	Xylene (ppb)	benzene (ppb)	TPH (ppm)
18	CS-B7-A	25.0	--	--	--	--	<2
19	SS-2B	20.0	<10	<10	<10	<10	<10
20	SS-2C	20'	<10	<10	<10	<10	<10
21	SS-2A	21'	<10	<10	<10	<10	<10
22	SS-3D	20'	<10	<10	<10	<10	<10

APPENDIX 3

**SOIL AND GROUNDWATER
INVESTIGATION REPORT**

for

**CAMPBELL SOUP COMPANY
Sacramento, California**

27 August 1987

prepared by the

AMERICAN ENVIRONMENTAL MANAGEMENT CORPORATION

Engineering Division
9719 Lincoln Village Drive, Suite 501
Sacramento, California 95827
(916) 364-8872

AMERICAN
ENVIRONMENTAL MANAGEMENT CORP

Please refer to:
AEMC Job No. 3360

28 August 1987

Mr. Larry F. Nash
Senior Engineer
California Regional Water
Quality Control Board
Central Valley Region
3443 Routier Road
Sacramento, California 95827-3098

RE: CAMPBELL SOUP COMPANY
6200 Franklin Boulevard
Sacramento, California

Dear Mr. Nash:

On behalf of Campbell Soup Company, the American Environmental Management Corporation (AEMC) is hereby submitting the enclosed Soil and Groundwater Investigation Report for your office's review and approval.

This Report presents the results and conclusions of all field and laboratory work conducted by AEMC for the subject facility during the months of April 1987 through July 1987. Investigation activities were successfully accomplished in accordance with recommendations presented in the Site Assessment Report, dated 22 April 1987.

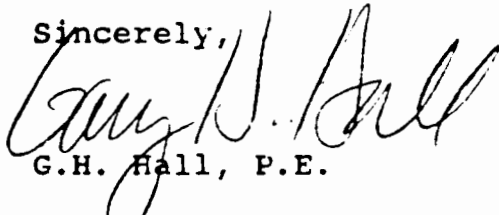
Upon review of the investigation findings and results, AEMC has concluded that the extent of soil and groundwater contamination is limited and poses no apparent threat to the environment or to public health. AEMC is recommending that Campbell Soup Company initiate a one year groundwater monitoring program designed to the confirm findings and conclusions presented in the report.

Mr. Larry F. Nash
28 August 1987
Page Two

Campbell Soup Company is prepared to initiate the groundwater monitoring program immediately upon your review and concurrence with the findings, conclusions and recommendations presented in the report.

Please direct all questions and comments to my attention at the Engineering Division of AEMC.

Sincerely,

A handwritten signature in cursive script, appearing to read "G.H. Hall", written over the typed name.

G.H. Hall, P.E.

Enclosure

cc: Mr. Robert C. Locke, Campbell Soup Company, Camden, NJ
Mr. Douglas J. Sinclair, Campbell Soup Company, Sacramento

Regional groundwater flow is expected to be to the southeast towards the Elk Grove Pumping Station.¹ The regional flow direction was erroneously reported to be to the northwest in the 22 April 1987 Site Assessment Report.

A review of water supply well records (Appendix 7) indicates that since 5 January 1987, Water Supply Well No. 2 has been the dominant pumping well. From 23 September 1986 through 16 December 1987, Water Supply Well No. 5, located about 1,000 feet northwest of the enamel tank area, was the dominant pumping well. Although there exists no substantiating data, AEMC believes it is unlikely, due to its distance, that Water Supply Well No. 5 could have reversed or significantly affected the natural southeast gradient in the investigation area.

Summary of Conclusions

AEMC is able to make the following conclusions based upon review and evaluation of all available site investigation information to date:

1. The source of soil and subsequent groundwater contamination was a leaking enamel coating pipeline near the pumping island/tank farm. Campbell Soup repaired the pipeline and subsequently leak tested all tank and pumping equipment. AEMC excavated contaminated soil for offsite Class I disposal and/or onsite aeration. The entire product tank system recently tested tight and the area repaved in concrete.
2. Any remaining soil contamination from the enamel coating pipeline leak is apparently limited to the enamel pump area and does not extend to a depth greater than 15 to 20 feet. Conclusive definition of the contamination is not possible because existing tanks, pumps and associated pipeline obstruct detailed soil investigation.
3. The contamination pathway to groundwater at the 60 to 65-foot depth is not defined at this time. Existing soil sampling data does not support that enamel coating product had migrated beyond the 15 to 20-foot depth.

It is a possibility that minor quantities of enamel coating were inadvertently carried from the soil contamination zone (5 to 20-foot depth) down to groundwater during construction of MW-1 in December 1986.

1. "Lines of Equal Elevations in Well", California Department of Water Resources, Spring 1980.

4. The regional and localized hydraulic gradient is generally towards the southeast.
5. Elevated concentrations of organic constituents have been detected only in MW-1, directly beneath the enamel tank pump area. The concentrations present in MW-1 apparently do not pose a significant threat to public health or the environment. MW-7, located about 40 feet and down gradient from MW-1, is free of contamination.

RECOMMENDATIONS

AEMC recommends the immediate implementation of an extensive one-year monitoring program at the Sacramento facility of Campbell Soup Company.

1. Collect water samples from MW-1, MW-6 and MW-7 on a quarterly basis, and analyze each sample for paint thinner (GC/FID) and aromatic volatile organics (EPA Method 602).
2. Monthly measurements of water elevations in all monitoring wells; and monthly review and evaluation of water supply well pumping rates to further define the hydraulic gradient.
3. Quarterly reporting of all information and submittal of results and conclusions to the Central Valley RWQCB.
4. Pending the results of this groundwater monitoring program, Campbell Soup Company will initiate remedial actions as required by the Central Valley RWQCB.

APPENDIX 4

RECEIVED JUL 2 5 1989



6200 FRANKLIN BLVD.
SACRAMENTO, CA 95824-3499

Please Refer to:
AEMC Job No. 3360

22 July 1989

Mr. Larry Nash
California Regional Water Quality Control Board
Central Valley Region
3443 Routier Road
Sacramento, California 95827-3098

RE: GROUNDWATER MONITORING PROGRAM
CAMPBELL SOUP COMPANY, SACRAMENTO, CALIFORNIA

Dear Mr. Nash:

Campbell Soup Company of Sacramento, California, has been monitoring groundwater quality over the past two years. The monitoring was instituted after a leak in the piping system was discovered and repaired and Campbell Soup desired to keep the tank system in operation. The underground tanks and piping have recently been removed. Based on the information gained during the tank removals, the ongoing monitoring program and original investigation activities, Campbell Soup Company requests that the groundwater monitoring program related to the underground storage tanks be discontinued. The following information is presented to support this request.

Background

In June 1986, in response to a leak of enamel and/or thinner from its underground storage system, Campbell Soup Company implemented remedial measures, including removal of contaminated soil around the pump and piping system, drilling and sampling exploratory borings, installing groundwater monitoring wells, and performing periodic groundwater monitoring. Refer to American Environmental Management Corporation's (AEMC's) "Soil and Groundwater Investigation Report," dated August 1987, and also the periodic groundwater monitoring reports submitted as part of the monitoring program, for more details. More recently, the four enamel and thinner tanks were closed and removed, along with piping and other appurtenances. At the same time, the remaining contaminated soil in the tank area was excavated. Three additional soil borings were drilled and sampled to verify all contamination was removed. These activities are described more fully in AEMC's letter report dated 26 June 1989.

Mr. Larry Nash
22 July 1989
Page 2

Recommendation

Based on the information obtained through performance of the actions listed above, we recommend the groundwater monitoring program be ended. This recommendation is based on the following facts:

1. Soil Excavation. Following removal of the underground storage tanks, approximately 1,000 yards of contaminated soil was removed from the excavation. Confirmation sampling from the sidewalls and bottom of the excavation shows levels of contamination in the remaining soil have been reduced to below laboratory analyses limits.
2. Soil Borings. Samples obtained from seven soil borings drilled in the vicinity of the tank system show the contamination to be isolated to the excavation area. This confirms and supports the findings made during the excavation activities.
3. Groundwater Monitoring. Groundwater samples obtained from the monitoring wells over the last year show extremely low levels of contaminants to be present, when present at all. None of the contaminants detected in that time even closely approach the Department of Health Services' State Action Levels (SAL) established to protect human health and welfare. In fact, the 18 ug/l (ppb) xylenes detected in MW-1 in August 1988 (nothing has been detected since) is well below the SAL of 620 ug/l.

It is clearly evident that in removing the tanks, piping and surrounding contaminated soil, any possible source of groundwater contamination has been eliminated. Soil borings and samplings of the excavation confirm and support this. Further, there is no reason to believe that the tank system has ever significantly affected groundwater, since clean soil is encountered at approximately 15 to 20 feet deep and groundwater is at about 50 feet deep.

The contaminant levels originally seen in groundwater samples have dissipated almost completely. With the contaminant source removed, there is no reason to expect any further degradation of groundwater quality in the future.

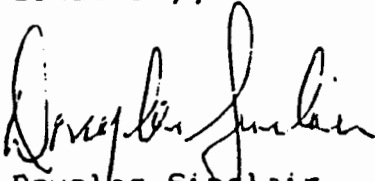
In consideration of the information discussed in this letter, Campbell Soup Company finds no basis upon which to continue monitoring the groundwater. Ending the monitoring program is the logical next step in the present remediation/investigation process.

Campbell Soup Company is also concerned that we begin backfilling the excavation with concrete rubble and clean fill as soon as possible in order to minimize the safety hazard of having this pit open so near one of our major travel routes. We would then complete the backfilling and concrete slab when aeration has been completed.

Mr. Larry Nash
22 July 1989
Page 3

We look forward to your timely response in this matter. If you have any questions or comments regarding this submittal, please do not hesitate to contact the undersigned.

Sincerely,



Douglas Sinclair
Project Manager
Campbell Soup Company

DS/go

cc: Ms. Laura Campbell - Sacramento County Environmental Health Div.
Mr. T. I. Duwe
Mr. T. C. Eyman
~~Ms.~~ Elizabeth Gillis - American Environmental
Mr. D. R. Lanning
Mr. R. C. Locke - G.O. Box 80



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

Certified Mail # P 460 807 000
Return Receipt Requested

In Reply H-4-4

Refer to:

EPA ID # CAD 009 198 367

SEP 15 1991

Mr. Bob Cook
Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California 95824

Dear Mr. Cook:

Ecology and Environment, Incorporated has completed a Preliminary Assessment (PA) of Campbell Soup Company on behalf of the Environmental Protection Agency (EPA). During this investigation, Ecology and Environment, Incorporated gathered information in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA) of 1976. A copy of the PA report is enclosed for your records.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. EPA handles such releases according to the regulations governing business confidentiality claims (40 C.F.R. Part 2). You should make any claim of confidentiality within fifteen (15) working days of the receipt of this letter. EPA will construe a failure to furnish a timely claim as a waiver of the confidentiality claim. Any claim of confidentiality should identify the specific pages or portions of pages of the PA report which are considered confidential and should also give a detailed explanation of the basis for such a claim.

If you have any further questions regarding this report, please contact Nancy Nadel of the RCRA Corrective Action Section at (415) 744-2043.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Lindsay".

Nancy Lindsay, Chief
RCRA Corrective Action Section

Enclosure

cc: Megan Cambridge, DHS-TSCP
Bill Crooks, RWQCB

R E P O R T T R A N S M I T T A L

Date delivered to H-8-1: 8-27-91

CBI Claim is pending:

Copies of this RCRA Preliminary Assessment for Campbell Soup Company should be sent to the following agencies and individual:

Releasable

Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California 95824
ATTN: Bob Cook

*Not
releasable*

California Regional Water Quality Control Board
Central Valley Region
3443 Routier Road, Suite A
Sacramento, California 95827-3098
ATTN: Bill Crooks

*Not
releasable*

California Department of Health Services TSCP
Site Mitigation Branch, Site Evaluation Unit
10151 Croydon Way, Suite 3
Sacramento, California 95827
ATTN: Megan Cambridge

*Pls. Adv. H-8-1
9.17.91*

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT

Purpose: RCRA Preliminary Assessment

Site: Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California
Sacramento County

Site EPA ID Number: CAD009198367

TDD Number: F9-9105-006

Program Account Number: FCA1765RAA

FIT Investigators: Juliet Shin
Kira Pyatt

Date of Inspection: June 6, 1991

Report Prepared By: Juliet Shin *JS*

Report Date: August 16, 1991

Through: Kate Dragolovich *KD*

FIT Review/Concurrence: *James M. James* *8/16/91*

Submitted To: Rachel Loftin
Site Assessment Manager
EPA Region IX



ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

recycled paper

1. INTRODUCTION

As part of its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) to conduct a Preliminary Assessment (PA) of the Campbell Soup Company site, located at 6200 Franklin Boulevard, Sacramento, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA) with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), in order to set priorities for cleanup of the most environmentally significant sites first. The Preliminary Assessment is conducted using CERCLA Hazard Ranking System (HRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, assists in prioritizing facilities for the RCRA program.

2. SITE DESCRIPTION

2.1 SITE LOCATION AND OWNER/OPERATOR HISTORY

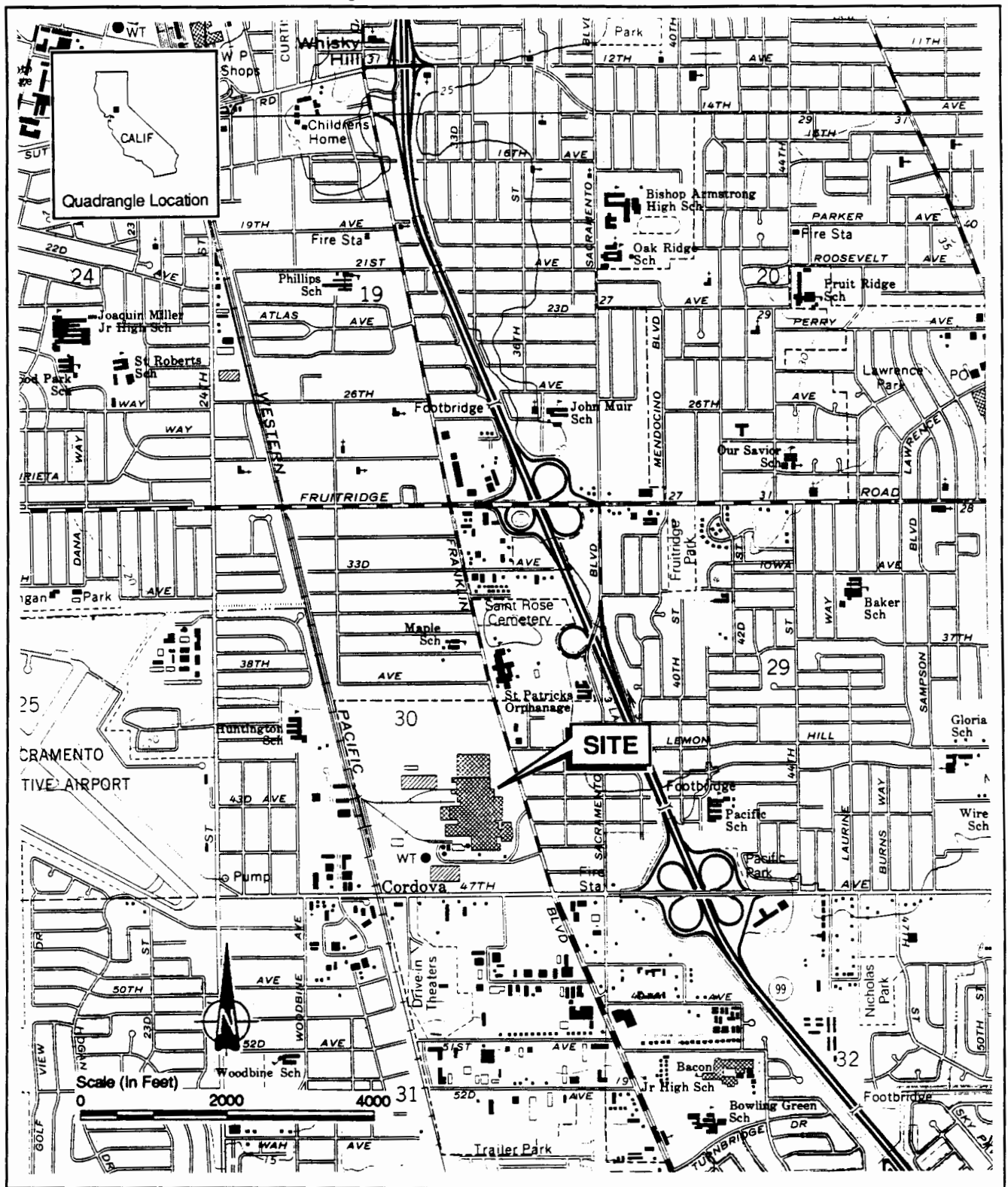
The Campbell Soup Company (Campbell Soup) site is located at 6200 Franklin Boulevard in the City of Sacramento, California (T. 8 N., R. 5 E., sec 31, Mount Diablo Baseline and Meridian, lat. 38°30'31"N., long. 121°27'8"W.) (see Figure 1) (1,3). The site covers approximately 123 acres in a mixed commercial and residential area (3). It consists of a general manufacturing building, two warehouses, and a 17-acre undeveloped field (4,5,6). Campbell Soup is bordered on the east by Franklin Boulevard, on the south by 47th Avenue, on the west by Western Pacific Railroad, and on the north by 39th Avenue (4).

The Campbell Soup facility has been at the site since 1948. Prior to this, the site was apparently an open field. Campbell Soup's headquarters are in Camden, New Jersey (4).

2.2 FACILITY PROCESSES/WASTE MANAGEMENT

Campbell Soup produces convenience food and juices at the site. The majority of hazardous wastes produced at the site result from packaging operations for the facility's line of food products (7). Solvent-based enamel wastes were generated at the site from the can manufacturing department until early 1991. These wastes were stored in drums in the hazardous waste storage area. The facility currently generates water-based enamel wastes from the can manufacturing process (4). Solvents used in the enameling of cans are reused until their percentage composition drops below an effective level (2). The spent solvents are then drummed and stored in the Hazardous Waste Storage Area. Approximately 55 55-gallon drums of solvent waste accumulate at the site over a seven- to eight-month period (4). The solvent waste is then transported and recycled by Romic Chemical Corporation (EPA ID#: CAD009452657) and American Environmental Management Corporation (EPA ID#: CAD980884183) (2,4).

Source: U.S.G.S. 7.5' Sacramento East Quadrangle



ecology and environment, inc.

Figure 1

SITE LOCATION MAP
Campbell Soup Company
6200 Franklin Blvd.
Sacramento, CA

Waste oils are generated at the site from the maintenance of equipment. They are stored in drums before being sent to a local recycler, Ramos Oil, in Sacramento (4).

There are a number of satellite collection areas for waste oil and enamels located in buildings throughout the site (see Figure 2). Once the 55-gallon drums located in these areas are full, they are taken to the hazardous waste storage area (4).

Other hazardous wastes generated at the site include spent batteries, Vedeo Jet Ink, asbestos, tank-bottom wastes (i.e., salt impurities that settle out in the facility's salt brine system), and polychlorinated biphenyls (PCBs). For further information about the generation and storage of these wastes, refer to section 4.1 (4).

Campbell Soup used to dispose of a portion of its tomato process wastewater onto a 17-acre field on site (5). Campbell Soup no longer discharges tomato wastewater on site (4,8).

3. REGULATORY INVOLVEMENT

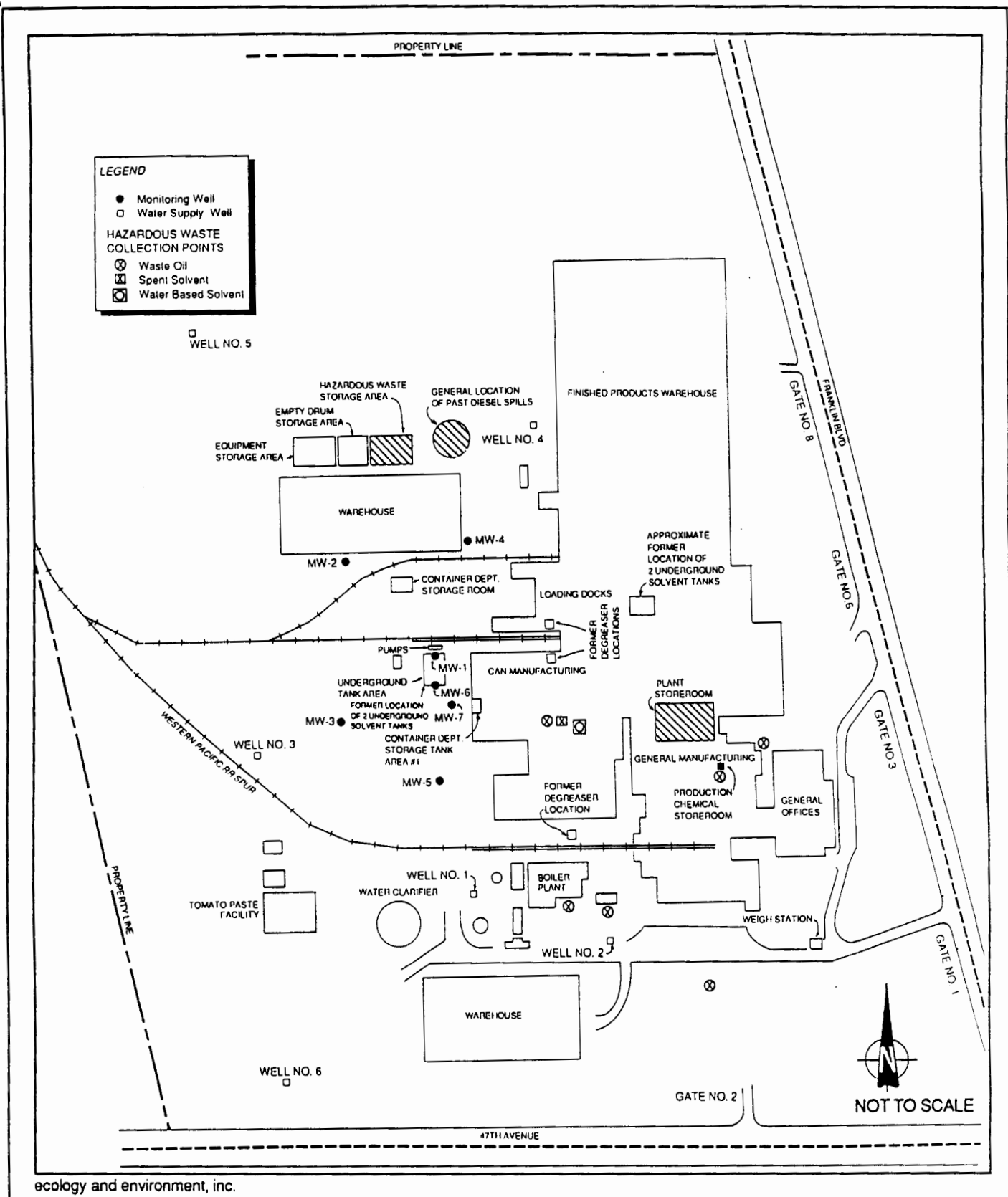
3.1 U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

The Campbell Soup site is listed in the May 1990 Resource Conservation and Recovery Act (RCRA) database as a generator, and as a Treatment, Storage, Disposal Facility (TSDF). Campbell Soup's RCRA notification was entered into the RCRA database on August 18, 1980. The Part A permit application was submitted to EPA on November 7, 1980 (14).

3.2 CALIFORNIA DEPARTMENT OF HEALTH SERVICES (DHS)

The facility was granted an Interim Status Document (ISD) on March 30, 1981, and on April 6, 1987 Campbell Soup was issued its current Hazardous Waste Facility Permit (2,15). The facility completed an Operation Plan which was submitted to DHS on June 6, 1983, and revised on June 7, 1985 (7). Campbell Soup is currently working with DHS to withdraw its TSDF status (16). Campbell Soup submitted a Closure Plan in 1987, which has been approved by DHS (49). Campbell Soup reportedly requested withdrawal of its TSDF status in a letter to DHS on November 20, 1990. The facility plans to begin storing hazardous wastes on site for less than 90 days (4).

DHS inspected the Campbell Soup facility on the following dates: September 23, 1981; May 27, 1982; November 17, 1982; January 14, 1983; August 2, 1983; May 29, 1985; May 10, 1986; January 29, 1987; August 23, 1988; and October 23, 1990 (2,3,17,18,19,20,21,22,23). During the October 23, 1990 inspection, DHS noted that Campbell Soup had five drums of hazardous waste which did not have start-of-accumulation dates (2). On November 17, 1982, DHS noted violations at the site concerning the use, storage, and disposal of PCBs. Active storm drains were observed at Transformer Substations 2 and 9. A tar-like residue was observed under a transformer drain valve located at Substation 6. A sample of the residue was taken; however, results of the sampling could



ecology and environment, inc.

Figure 2
FACILITY MAP
Campbell Soup Company
6200 Franklin Boulevard
Sacramento, California

not be located by FIT (23). All items of noncompliance noted in the November 17, 1982 inspection report were subsequently corrected (24).

3.3 REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)

On April 8, 1986, RWQCB entered into an agreement with County Health to study regional groundwater contamination. As part of this study, RWQCB has overseen bimonthly sampling of water supply wells at the Campbell Soup site (9,11).

On May 20, 1988, RWQCB issued Waste Discharge Requirement Order No. 88-083 to Campbell Soup to dispose of approximately 50,000 gallons per day of tomato process wastewater onto a 17-acre on-site field (5).

3.5 OTHER AGENCY INVOLVEMENT

The Sacramento County Air Pollution Control District has issued 13 permits to the facility: #477-#480; #482-#485, #564-#566; and #2435 and #2436 (14).

The Regional Sacramento County Sanitation District issued Campbell Soup an Industrial Sewer Use Permit on April 22, 1987 (25).

The Campbell Soup site has a National Pollutant Discharge Elimination System (NPDES) permit, issued on February 9, 1988. According to representatives of Campbell Soup, this permit allows for the discharge of cooling water from the heat exchangers into the storm drains (4).

The Sacramento County Environmental Health Department (County Health) issued Campbell Soup a Hazardous Materials Permit on July 1, 1990. County Health conducted an inspection at the site for the above permit on May 24, 1990. At that time, County Health noted that the hazardous waste drums were not labeled properly and that some hazardous waste drums did not have lids. County Health issued a permit to the facility, in approximately 1988, for one 1,000-gallon underground product Stoddard solvent tank. County Health inspects the site once a year because of this underground tank (26).

In May 1989, four underground tanks, that were used for the storage of solvent-based enamel product, were closed, removed, and transported off site under the supervision of County Health. Excavated subsurface soil that had been surrounding the tanks was sampled. Results indicated the presence of xylene and ethyl benzene. This soil contamination was most likely the result of a spill that occurred in 1987 when a pipeline connected to one of the underground tanks leaked. During the 1989 tank removal effort, soil samples were also collected from the boundaries of the excavation. Benzene, toluene, xylene, ethyl benzene, and total petroleum hydrocarbons were not detected in the samples (13).

In 1990, diesel fuel spilled onto bare soil when a pump was left unattended. Approximately 20 to 30 gallons of diesel were spilled (see Figure 2 for general location of spill). The cleanup was approved by County Health (2,4). Another diesel spill occurred in 1987 at the site. Three hundred gallons of diesel flowed into the bermed containment area

around the diesel tanks (2,48). However, sections 101(14) and (33) of CERCLA exclude petroleum from the definitions of "hazardous substance" and "pollutant or contaminant."

4. DESCRIPTIONS OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste Management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, and soil. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment, FIT has identified one significant SWMU at the site. It appears that this unit, the hazardous waste storage area, is RCRA-regulated. Additional SWMUs may exist.

4.1 HAZARDOUS WASTE STORAGE AREA

Unit Description: After collection at various locations in the plant, wastes are stored in the hazardous waste storage area. This area consists of a corrugated metal building that covers a concrete-paved area that is surrounded by a 6-inch berm. The maximum capacity of the hazardous waste storage area is 200 55-gallon drums. This area covers approximately 3,000 square feet (4,27). Wastes are stored in 55-gallon drums in this area for more than 90 days, prior to being transported off site (4). The drums are stacked on top of one another with wooden pallets placed between the different levels of drums (28).

Date of Start-up: The current Hazardous Waste Storage Area has been in use since 1985 or 1986. Before that time, the hazardous waste drums were stored outside on a concrete pad located in the same general area (4).

Date of Closure: The hazardous waste storage area is currently in use (4).

Waste Managed: Spent solvent-based and water-based enamels, spent solvents, waste oils, spent batteries, spent Vedeo Jet Ink, and PCBs are stored in the hazardous waste storage area (2,4,17).

Solvent-based enamel wastes were generated until early 1991 (4). They consisted of methyl ethyl ketone (MEK), methyl isobutyl ketone (MIK), and butanol (2,29). The facility currently uses water-based enamel (4).

Five to 10 gallons per month of Vedeo Jet Ink, containing MEK, is generated from the labeling process. The spent Vedeo Jet Ink is hauled away by Romic Chemical Corporation. Waste oils are generated from the maintenance of equipment (4).

Used forklift and car batteries are stored in the hazardous waste storage area and then either traded in for new batteries or sold to a recycler (4,17). In the past, the battery acids were disposed of at Chemical Waste Management's facility in Kettleman Hills (EPA ID#: CAT000646117) (18).

Light ballasts containing PCBs are collected in a 35-gallon drum which is stored in the hazardous waste storage area, prior to being transported off site to Kettleman Hills (4).

DHS listed tank-bottom wastes as being generated at the site (2). The tank-bottom wastes refer to salt impurities that settle out in the facility's salt brine system. Campbell Soup does not feel that it needs to haul the salt impurities as waste. Romic Corporation is currently sampling the material to determine if it needs to be hauled as waste. This waste was formerly drummed and stored in the hazardous waste storage area and was transported off site by American Environmental Management Corporation and IT Corporation. Currently, this waste is stored in drums immediately outside of the hazardous waste storage area (4).

Release Controls: The current hazardous waste storage area consists of a corrugated metal building that covers a concrete-paved area that is surrounded by a 6-inch berm. In the past, the hazardous waste storage area was located outside on a concrete pad in the same general area. It is unknown if this area was fenced or bermed (4,28).

History of Releases: There has been no known sampling in this area.

4.2 AREAS OF CONCERN

In 1985, DHS reported that a small amount of solvent waste was being stored in drums in the Parts Storage Area in the plant storeroom. DHS noted that fumes were coming from this area (19,30). This area probably stored up to six 55-gallon drums of spent solvent at one time. Campbell Soup stopped storing drums in this area approximately three years ago (4).

There are two caustic tanks on site: one 4,000-gallon tank and one 5,000-gallon tank. These tanks are used to store sodium hydroxide and chlorine which the facility receives in bulk quantity. These tanks are inspected by California Office of Occupational Safety and Health Administration (OSHA) (see Figure 2). In the event of a spill, the caustic would be contained within a basalt block, concrete-filled containment dike (30,31).

Empty drums--previously containing enamel, oil, and grease--are stored in a 150-square-foot area adjacent to the hazardous waste storage area. FIT does not have information as to whether these drums were cleaned prior to storage. This area is situated on a raised concrete pad, and is fenced on three sides (4).

Three plant degreasers were located on the site in the past. The start-up and removal dates of these degreasers is unknown (see Figure 2). The degreasers were approximately 12 feet by 5 feet by 6 feet high. To degrease machine parts, a 55-gallon drum of trichloroethene (TCE) was dumped into the tank and steam was used to heat the solvent. The heated solvent was then used to clean the parts. The major portion of the evaporated solvent was returned to the holding tank after being condensed by the water jacket. After the parts were degreased and still in the tank, the parts were sprayed with solvent from the holding tank. When

the degreasing operation was completed, all of the solvent left in the degreaser was pumped into a 55-gallon drum for storage and reuse during the next cleaning operation. The annual usage of TCE for degreasing operations was approximately seven drums. Except for a report describing the burial of two drums in the area south of the 4th shift Maintenance shop (250 feet southeast of No. 2 deep well), there are no other records describing disposal practices (32).

An insecticide, Cardinal S.F.-1, is stored in the pesticide storage building on site and is used to control insects at the facility. A maximum of 550 gallons of this insecticide may be stored in the pesticide storage building. Methyl bromide is also stored in the pesticide storage building and is used for fumigation (4).

Pipes within the Campbell Soup building are insulated with asbestos (2). Campbell Soup is removing the asbestos as needed (e.g., when piping needs to be removed or when there are modifications to the building). Removed asbestos is stored adjacent to the hazardous waste storage area, on the east side, in a trailer (see Appendix B for photographs) (4).

Contaminated soil may still exist on site as a result of the 1987 spill that occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product (see section 5.2 for details concerning the spill) (12). Although the underground tank was removed in 1989, and some contaminated soil was excavated, it is unknown to FIT if the excavated area was extensive enough to result in a complete cleanup (13).

5. HRS FACTORS

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following HRS factors relative to this site.

5.1 WASTE TYPE AND QUANTITY

Hazardous wastes at the site are generated from packaging operations and maintenance of machinery (4,7). The hazardous waste storage area has a maximum capacity of 200 55-gallon drums. The drums contain light ballasts containing PCBs; spent forklift batteries; solvent-based enamel wastes, which consist of MEK, MIBK, and butanol; and waste oil. In addition, until 1991, six 55-gallon drums of spent solvent were stored in the parts storage area. Removed asbestos is stored in a trailer on site. Contaminated soil apparently still exists on site as a result of a 1987 spill (2,4). The spill occurred from a leaking pipe connected to an underground tank containing solvent-based enamel product. Benzene, ethyl benzene, toluene, and xylene have been detected in soils in the area of the spill (12). See section 4 for details regarding waste sources.

5.2 GROUNDWATER

The Campbell Soup site is located in the southeast corner of the Sacramento Valley. The valley is bounded on the west by the Coast Ranges, on the northeast by the Cascade Range, and on the east by the Sierra Nevada (33). The subsurface geology of the area consists of alluvial deposits of poorly bedded siltstones, clays, and lenticular sandstones that do not form any clearly defined confining layers. The two most superficial water-bearing formations are the Victor and Fair Oaks formations (34). The regional groundwater gradient is predominantly in a southeasterly direction. Depth to groundwater at the site is approximately 50 feet. The underlying soils at the facility are predominantly medium to fine silty sands with discontinuous lenses of clayey silts and coarse gravels (5,12).

It appears that hazardous substances from the site have been released to groundwater. During 1987 and 1988, as part of a regional groundwater contamination study, County Health and RWQCB sampled four water supply wells on site. Analytical results of these efforts identified up to 4.8 micrograms per liter ($\mu\text{g/L}$) TCE in the on-site water supply well #2, which is located hydraulically downgradient of the processing plant. TCE has not been detected in three other on-site water supply wells which are located hydraulically upgradient of the processing plant. The four water supply wells are screened at comparable levels ranging from 100 to 400 feet below ground surface (9). TCE was used at the facility for parts cleaning until September 1984 (10). In addition, two drums of TCE may have been buried 250 feet southeast of water supply well #2 (11).

In 1987, a spill occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product. Campbell Soup repaired the pipeline and leak-tested the tank and pumping equipment. Thirty cubic yards of contaminated soil were excavated and transported to a Class I disposal facility. The excavated area was then resurfaced with cement. Six monitoring wells were then installed in the area where the pipe leak had occurred. During the drilling of monitoring well MW-1, soil samples were collected and the analytical results indicated the presence of benzene at 250 micrograms per kilogram ($\mu\text{g/kg}$), ethyl benzene (68,500 $\mu\text{g/kg}$), toluene (3,400 $\mu\text{g/kg}$), and xylene (237,000 $\mu\text{g/kg}$). Up to 2,280 $\mu\text{g/L}$ xylenes, 16 $\mu\text{g/L}$ toluene, 2 $\mu\text{g/L}$ benzene, 250 $\mu\text{g/L}$ ethyl benzene, 1.6 $\mu\text{g/L}$ trichloroethane (TCA), and 1.6 $\mu\text{g/L}$ tetrachloroethene (PCE) have been detected in groundwater samples collected from monitoring wells MW-1 and MW-2 (12).

There are three municipal drinking water systems located within 4 miles of the site: The City of Sacramento Municipal System, the Fruitridge Valley Water Company, and the Florin County Water System. The Sacramento Municipal System currently operates 43 wells which serve approximately 340,000 people. Seventeen percent of the water supplied by this system comes from groundwater, and the rest comes from surface water intakes (35). The Fruitridge Valley Water Company operates 15 wells and serves 4,625 connections (37). The Florin County Water Department operates nine wells which serve approximately 2,209 connections (36). It was estimated that there are 2.41 people per household in Sacramento (40). Groundwater in the

Fruitridge Valley and Florin County water systems is not blended with any other source before being distributed to customers (36,37).

Groundwater is used at the site for food processing. Additionally, groundwater within 4 miles of the site is used for irrigation (4,41).

5.3 SURFACE WATER

The potential for a release to surface water appears to be low because surface runoff from the site enters a ditch located more than 2,000 feet east of the site (1). This ditch runs south along Highway 99 until it outfalls into Morrison Creek located 0.75 miles south of the site (42). Morrison Creek flows perennially through the city of Sacramento. It travels approximately 6 miles from where the ditch outfalls into Morrison Creek before reaching a below sea level basin where its water is pumped into the Sacramento River. There are no drinking water intakes, but there is recreational fishing in Morrison Creek and the Sacramento River. Additionally, Morrison Creek and adjacent ponds are considered wetlands (43,44,45).

5.4 AIR

Hazardous substance sources currently on site appear to be adequately contained to prevent a release to air. The drums in the hazardous waste storage area are sealed, intact, and contained in a shed. In addition, contaminated soil is located beneath pavement (4,12).

The population within 4 miles of the site is approximately 187,300 (46).

5.5 SOIL EXPOSURE

The likelihood of an on-site exposure incident appears to be low because the hazardous waste storage area is enclosed within a padlocked shed and contains intact, sealed drums. In addition, contaminated soil is located beneath pavement (4).

There are no residences, schools, day care centers, or sensitive environments on site (4,47). Campbell Soup employs approximately 1,800 workers (4). The number of people living within 1 mile of the site is approximately 17,570 (46).

6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

6.1 AGENCIES CONTACTED

FIT contacted the following agencies with inquiries into their involvement with the Campbell Soup site: RWQCB, DHS, and County Health.

6.2 RECONNAISSANCE OBSERVATIONS

Information gathered during the site reconnaissance is presented throughout this report. For additional information, refer to the Site Reconnaissance Interview and Observations Report in Appendix A and the photographs in Appendix B (4).

A site reconnaissance was conducted at Campbell Soup Company on June 6, 1991 by FIT members Juliet Shin and Kira Pyatt. The inspection began at 12:00 p.m. at the facility, where FIT met with Bob Cook, Randy Foster, Tom Duwe, Mark Elliott, and Lynn Cissell, all Campbell Soup Company employees. An interview was conducted, followed by a site tour (4).

A summary of observations made by FIT during the site tour is as follows:

- o Drums of solvent-based and water-based enamel waste, waste oil, spent Video Jet Ink, PCBs, and used batteries were observed in the hazardous waste storage area.
- o There were two inactive aboveground product tanks adjacent to the hazardous waste shed.
- o Approximately five 55-gallon drums of salt brine were being stored immediately outside of the hazardous waste storage area directly on the asphalt, prior to transport off site.
- o FIT toured the site of the 1990 diesel spill, and observed an excavated area where some soil had been removed.
- o A strong solvent odor was noted to be coming from the can manufacturing department.

7. EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415(b)(2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment.

There is no apparent need for a referral to EPA's Emergency Response Section at this time because the hazardous waste storage area consists of a locked metal shed containing intact, sealed drums; and contaminated soil is located beneath pavement (4). Additionally, it appears that DHS and RWQCB are actively involved with the site (9,11,49).

8. SUMMARY OF HRS CONSIDERATIONS

The Campbell Soup Company (Campbell Soup) site is located at 6200 Franklin Boulevard, Sacramento, California (1,3). The site covers approximately 123 acres in a mixed commercial and residential area (18).

Campbell Soup produces convenience food and juices at the site. Hazardous wastes are generated from the packaging operations and maintenance of machinery (4,7). These wastes (i.e., spent solvent-based and water-based enamels, spent solvents, waste oils, used batteries, spent Video Jet Ink, and PCBs) are stored in the hazardous waste storage area for more than 90 days prior to being transported off site (4).

It appears that hazardous substances from the site have been released to groundwater. In 1987 and 1988, up to 4.8 µg/L trichloroethylene was detected in on-site water supply well #2 (9). In addition, up to 2,280 µg/L xylenes, 16 µg/L toluene, 2 µg/L benzene, 250 µg/L ethyl benzene, 1.6 µg/L TCA, and 1.6 µg/l PCE have been detected in on-site monitoring wells MW-1 and MW-2 (12). There are three municipal drinking water systems located within 4 miles of the site. Together, these three systems serve a blend of surface water and groundwater to approximately 356,469 people within 4 miles of the site (35,36,37,38,39,40).

Surface runoff from the site enters a ditch that is located approximately 2,000 feet east of the site. This ditch discharges to Morrison Creek and runs for approximately 6 miles before discharging in the Sacramento River. There are no drinking water intakes, but there is some recreational fishing, in Morrison Creek and the Sacramento River. Additionally, Morrison Creek, and adjacent ponds, are considered wetlands (43,44,45).

Although there are approximately 1,800 workers on site daily, the potential for on-site exposure or a release to air appears to be low because the hazardous waste storage area is enclosed within a padlocked shed and contains intact, sealed drums. In addition, contaminated soil is located beneath pavement (4). The population within 1 mile of the site is approximately 17,570 (46).

The following are significant Hazard Ranking System factors associated with the Campbell Soup Company site:

- o There appears to have been a release of contaminants to an on-site drinking water well at concentrations exceeding health-based benchmarks;
- o There are approximately 1,800 workers on site daily; and
- o There are three municipal drinking water systems within 4 miles of the site that supply a blend of groundwater and surface water to approximately 356,469 people.

9. EPA RECOMMENDATION

	<u>Initial</u>	<u>Date</u>
No Further Remedial Action Planned under CERCLA	_____	_____
Higher-Priority SSI under CERCLA	_____	_____
Lower-Priority SSI under CERCLA	_____	_____
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	<u> <i>p</i> </u>	<u> 9.17.91 </u>

Notes:

10. REFERENCES

1. U.S. Geological Survey, map of Sacramento, California, 7.5-minute quadrangle, 1968 (photorevised 1980).
2. California Department of Health Services (DHS), inspection report, Campbell Soup Company, Sacramento, California, November 2, 1990.
3. DHS, inspection report, Campbell Soup Company, Sacramento, California, August 24, 1988.
4. Shin, Juliet, and Kira Pyatt, Ecology and Environment, Inc., Field Investigation Team (E & E FIT), site reconnaissance notes, Campbell Soup Company, Sacramento, California, June 6, 1991.
5. California Regional Water Quality Control Board (RWQCB), Central Valley Region, "Order No. 88-083, Waste Discharge Requirements For Campbell Soup Company, Sacramento County," May 20, 1988.
6. Cook, Bob, Campbell Soup Company, to Juliet Shin, E & E FIT, letter with facility map attached, June 14, 1991.
7. DHS, Hazardous Waste Facility Permit, Campbell Soup Company, Sacramento, California, effective date: April 6, 1987; expiration date: April 6, 1992.
8. Henao, Joseph, RWQCB, to Wayne Pierson, RWQCB, internal memorandum re: rescission of Order No. 88-129, Campbell Soup, Sacramento, California, September 10, 1990.
9. RWQCB, Larry Nash to Peter Haase, internal memorandum re: water supply well investigation at Campbell Soup, Sacramento, California, June 1, 1988.
10. Sinclair, D.J., Campbell Soup Company, to Peter Haase, RWQCB, letter re: monitoring well information, February 9, 1988.
11. RWQCB, meeting notes re: Campbell Soup Company-groundwater monitoring/assessment programs, September 14, 1989.
12. American Environmental Management Corporation, "Soil and Groundwater Investigation Report for Campbell Soup Company, Sacramento, California," August 27, 1987.
13. Gillis, Elizabeth, American Environmental Management Corporation, to Laura Campbell, Sacramento County Environmental Health Department, letter re: underground storage tank removal at Campbell Soup Company, Sacramento, California, Job No. 81160, June 21, 1989.
14. EPA, Part A Permit Application, Campbell Soup Company, Sacramento, California, dated November 7, 1980.

15. DHS, "Interim Status Document," Campbell Soup Company, Sacramento, California, effective date: March 30, 1981.
16. Cook, Bob, Campbell Soup Company, and Juliet Shin, E & E FIT, telephone conversation, May 22, 1991.
17. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, June 3, 1985.
18. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, January 29, 1987.
19. DHS, "Hazardous Waste Management Report," Campbell Soup Company, Sacramento, California, May 29, 1985.
20. DHS, inspection report, Campbell Soup Company, Sacramento, California, September 23, 1981.
21. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, May 10, 1986.
22. DHS, inspection report, Campbell Soup Company, Sacramento, California, May 27, 1982.
23. Posner, Stephen, DHS, to Brad Parsons, DHS, internal memorandum re: Campbell Soup facility, dated November 17, 1982.
24. Stahler, James, DHS, to Thomas Malson, Campbell Soup Company, letter re: corrections to violations, January 25, 1983.
25. Sacramento Regional County Sanitation District, Industrial Sewer Use Permit, Campbell Soup Company, Sacramento, California, April 22, 1987.
26. Luma, Gloria, Sacramento County Environmental Health Department, and Juliet Shin, E & E FIT, telephone conversation, June 18, 1991.
27. Yee, Jimmie, Cole/Yee/Schubert & Associates, to Doug Sinclair, Campbell Soup Company, letter re: design and construction of container storage area, June 10, 1983.
28. DHS, inspection report, Campbell Soup Company, Sacramento, California, photos, inspected by Sam Zarek, May 29, 1985
29. Romic Chemical, sample profile sheet for water-based paint rinse water, Campbell Soup Company, Sacramento, California, September 10, 1990.
30. Cook, Bob, Campbell Soup Company, and Juliet Shin, E & E FIT, telephone conversation, June 19, 1991.

31. Campbell Soup Company, "Contingency Plan and Emergency Procedures for the Protection of Groundwater and Surface water in the Event of Spills and Unplanned Discharges to Land," Sacramento, California, October 1985.
32. Sinclair, D.J., Campbell Soup Company, to Larry Nash, RWQCB, letter re: Campbell Soup Company, groundwater supply wells investigation, August 15, 1988.
33. U.S. Geological Survey, "Geologic Features and Ground-Water Storage Capacity of the Sacramento Valley California," Water-Supply Paper 1497.
34. Johnson, Karen, "Chemical Quality of Groundwater In Sacramento and Western Placer Counties, California," United States Geological Survey, Water Resources Investigations, Report 85-4164, Sacramento, California, November 1985.
35. Short, Walter, City of Sacramento, and Toner Mitchell, E & E FIT, telephone conversation, December 3, 1990.
36. Martello, Betty, Florin County Water Department, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
37. Haskell, Betty, Fruitridge Vista Water Company, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
38. Luhdorff and Scalmanini Consulting Engineers, "SAWWA 1988 Title 22-AB 1803 Groundwater Basin Monitoring Program, Sheet 1, LSCE 88-2-070."
39. Compass Maps, Inc., Wells and Sumps of Sacramento, DRWG. No. 7-31, Sacramento, California, Copyright MCMLXVII Edition of 1985.
40. Kraft, Mark, City of Sacramento, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
41. Short, Walt, City of Sacramento, and Kira Pyatt, E & E FIT, telephone conversation, November 27, 1990.
42. Blackwood, Church, Sacramento County Public Works Department, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
43. Santin, Ray, City of Sacramento Public Works Department, and Kimberly Bell, E & E FIT, telephone conversation, September 15, 1989.
44. Coppola, John, Sacramento County Water Resources Division, and Kimberly Bell, E & E FIT, telephone conversation, October 31, 1989.
45. Fjelstad, Maury, Department of Fish and Game, and Kimberly Bell, E & E FIT, telephone conversation, September 15, 1989.

46. U.S. EPA, Office of Toxic Substances, "Graphical Exposure Modeling System," March 1989.
47. California Department of Fish and Game, "Natural Diversity Data Base," Sacramento quadrangle.
48. Sinclair, D.J., Campbell Soup Company, to Mr. Duwe, Campbell Soup Company, internal memorandum re: diesel fuel spill into containment area, August 20, 1987.
49. Hong, Eric, DHS, and Juliet Shin, E & E FIT, telephone conversation, May 23, 1991.

APPENDIX A

CONTACT LOG AND REPORTS

CONTACT LOG

Facility Name: Campbell Soup Company
Facility ID: CAD009198367

Name	Affiliation	Phone #	Date	Information
Ray Santin	City of Sacramento	(916) 449-5226	9/15/89	See Contact Report.
Maury Fjelstad	Resources Agency	(916) 355-7090	9/15/89	See Contact Report.
John Coppola	Sacramento County Water Division	(916) 440-6851	10/31/89	There are no drinking water intakes from the Sacramento River, in Sacramento County, after the point where Morrison Creek water enters the Sacramento River.
Dave Kohlhorst	California Dept. of Fish and Game	(209) 466-4421	8/22/90	See Contact Report.
Fred Meyers	California Dept. of Fish and Game	(916) 355-7090	8/27/90	See Contact Report.
Walt Short	City of Sacramento	(916) 449-8730	11/27/90	See Contact Report.
Walt Short	City of Sacramento	(916) 449-8730	12/3/90	See Contact Report.
Gloria Luma	Sacramento County Environmental Health Department	(916) 386-6160	5/14/91	The County Health Department has files on Campbell Soup.
Wayne Pierson	RWQCB	(916) 361-5629	5/14/91	RWQCB has files on Campbell Soup Company.
Alberta Mac-Murray	DHS	(916) 855-7700	5/14/91	DHS has files on Campbell Soup Company.
Chuck Blackwood	Sacramento County Public Works Dept.	(916) 440-6851	5/14/91	See Contact Report.
Betty Haskell	Fruitridge Valley Water Company	(916) 443-2607	5/14/91	See Contact Report.

Betty Martello	Florin County Water Department	(916) 383-0808	5/14/91	See Contact Report.
Mark Kraft	City of Sacramento	(916) 449-5604	5/14/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	5/22/91	See Contact Report.
Eric Hong	DHS	(916) 855-7726	5/23/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	6/6/91	Site Reconnaissance Interview and Observations
Gloria Luma	Sacramento County Environmental Health Department	(916) 386-6178	6/18/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	6/19/91	See Contact Report.
Mark Elliott	Campbell Soup Company	(916) 428-7890	8/15/91	All the on-site supply wells are interconnected.

CONTACT REPORT

AGENCY/AFFILIATION: Sacramento City of Public Works Department		
DEPARTMENT: A Division-Flood Control and Sewers		
ADDRESS/CITY: 1391 35th Avenue, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95822		
CONTACT(S)	TITLE	PHONE
1. Ray Santin	Operations Superintendent	(916) 449-5226
2.		
E & E PERSON MAKING CONTACT: Kim Bell		DATE: 9/15/89
SUBJECT: Morrison Creek		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

The water in Morrison Creek is not treated until after it is pumped into the Sacramento River.

Mr. Santin believes some farmers use creek water for irrigation of crops. He said to double check with another agency, because he is not certain.

* Contact Report was originally prepared for the Sacramento Surplus Sales site, CAD980881254.

CONTACT REPORT

AGENCY/AFFILIATION: Resources Agency		
DEPARTMENT: Department of Fish and Game		
ADDRESS/CITY: 1701 Nimbus Road, Suite A, Rancho Cordova		
COUNTY/STATE/ZIP: Sacramento, California 95670		
CONTACT(S)	TITLE	PHONE
1. Maury Fjelstad	District Fishery Biolog.	(916) 355-7090
2.		
E & E PERSON MAKING CONTACT: Kim Bell		DATE: 9/15/89
SUBJECT: Morrison Creek		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

The entire creek is considered a wetland, as are the lakes connected to it.

The creek was planted with the following fish in 1955: white catfish, bluegill, warmouth, and brown bullhead.

The creek probably has other warm water fish it has gained from other water bodies that flow into it.

Only recreational fishing occurs in Morrison Creek. No commercial fishing occurs.

* Contact Report was originally prepared for the Sacramento Surplus Sales site, CAD980881254.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Fish and Game		
DEPARTMENT: Fisheries		
ADDRESS/CITY: 1701 Nimbus Road		
COUNTY/STATE/ZIP: Rancho Cordova, California 95670-4503		
CONTACT(S)	TITLE	PHONE
1. Dave Kohlhorst	Fishery Biologist	(209) 466-4421
2.		
E & E PERSON MAKING CONTACT: Kira Pyatt		DATE: 8/22/90
SUBJECT: Fishery in Sacramento River		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

The California Department of Fish and Game have studied anadromous fish populations in the Sacramento River. The estimated sturgeon catch for the American and Sacramento Rivers is about 4,500 pounds per year (lb/yr). The striped bass catch is 52,000 lb/yr. This estimate is taken from Courtland to the mouth of the Feather River (approximately 45 miles).

* Contact Report was originally prepared for the Sacramento Municipal Landfill site, CAD981382161.

CONTACT REPORT

AGENCY/AFFILIATION: City of Sacramento		
DEPARTMENT: Water and Sewer Department		
ADDRESS/CITY: 1391 35th Avenue, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95822		
CONTACT(S)	TITLE	PHONE
1. Walt Short		(916) 449-8730
2.		
E & E PERSON MAKING CONTACT: Kira Pyatt		DATE: 11/27/90
SUBJECT: Well use within 4 miles of the landfill		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

Seventeen percent of the overall water supply for the City of Sacramento is groundwater. The average depth of wells in Sacramento are 250 to 300 feet.

Wells that are in use year round with heavy use: 157, 156, 116, 159, 91, 158, 143, 120, 122, 124, 123, 159, 94, 93, 92, 129, 134, 138, 131, 155, 126, 135, 136, 127, 144, 151.

Wells which are used with minimal frequency: 114, 112, 110, 111, 142, 109, 117, 119, 132.

Wells which are used for irrigation: 20, 1, 2, 4, 3, 41, 50, 48, 61.

Wells which are no longer used: 161, 8, 125, 141, 140, 139, 146.

There are 43 active drinking water wells in the Sacramento Water District and a population of 346,600 people served (111,785 residences are served as of 1989). Well number 132 is on restricted use and well number 150 is abandoned because of contamination from McClellan Air Force Base. There are 20 active irrigation wells in the Sacramento Water District.

* Contact Report was originally prepared for the Sacramento Municipal Landfill site, CAD981382161.

CONTACT REPORT

AGENCY/AFFILIATION: City of Sacramento		
DEPARTMENT: Public Works		
ADDRESS/CITY: Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Walter Short		(916) 449-8730
2.		
E & E PERSON MAKING CONTACT: Toner Mitchell		DATE: 12/3/90
SUBJECT: Groundwater		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

The City of Sacramento operates 43 production wells. These wells provide approximately 17 percent of Sacramento's drinking water. The rest of the city's water comes from the American River. The City of Sacramento serves approximately 340,000 people with drinking water.

* Contact Report was originally prepared for the Auto Wrecking Yard site, CAD982358277.

CONTACT REPORT

AGENCY/AFFILIATION: Arcade County Water District		
DEPARTMENT:		
ADDRESS/CITY: Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Roy Hafar		(916) 972-7171
2.		
E & E PERSON MAKING CONTACT: Toner Mitchell		DATE: 12/12/90
SUBJECT: Water supply information		
SITE NAME: Campbell Soup Company *		EPA ID#: CAD009198367

Arcade County Water District operates 59 wells, all of which are screened between 300 and 400 feet below ground surface. Mr. Hafar estimates that the District serves approximately 100,000 people with drinking water.

* Contact Report was originally prepared for the Auto Wrecking Yard site, CAD982358277.

CONTACT REPORT

AGENCY/AFFILIATION: Florin County Water Department		
DEPARTMENT:		
ADDRESS/CITY: P.O. Box 28177, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95828		
CONTACT(S)	TITLE	PHONE
1. Betty Martello		(916) 383-0808
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/14/91
SUBJECT: Number of wells and people served		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

There are nine wells in the system that serves 2,209 connections with solely groundwater.

CONTACT REPORT

AGENCY/AFFILIATION: City of Sacramento		
DEPARTMENT: Advanced Planning Department		
ADDRESS/CITY: 1231 I Street, 3rd Floor, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Mark Kraft	Planner	(916) 449-5604
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/14/91
SUBJECT: Average Population per household		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

The average population per household in Sacramento as of 1990, from the Department of Finance, is 2.41 people.

CONTACT REPORT

AGENCY/AFFILIATION: Fruitridge Valley Water Company		
DEPARTMENT:		
ADDRESS/CITY: 1108 2nd Street, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95814		
CONTACT(S)	TITLE	PHONE
1. Betty Haskell		(916) 443-2607
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/14/91
SUBJECT: Number of wells and people served		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

There are 15 wells in this system which serve approximately 4,625 connections with groundwater only.

CONTACT REPORT

AGENCY/AFFILIATION: Sacramento County Public Works		
DEPARTMENT: Water Resources Department		
ADDRESS/CITY: 827 7th Street, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95814		
CONTACT(S)	TITLE	PHONE
1. Chuck Blackwood	Plan Checker	(916) 440-6851
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/14/91
SUBJECT: Floodplain and surface runoff from site		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

Campbell Soup Company is in the County of Sacramento. The majority of the site is in a temporary floodplain that is subject to a 500-year flood if the levees in Sacramento River and the American River were to break. This would affect Morrison Creek near the site.

It appears that surface runoff from the area of the site would drain into the ditch that runs along Highway 99. The ditch runs south along Highway 99 and eventually enters into Morrison Creek. Morrison Creek eventually outfalls into the Sacramento River.

CONTACT REPORT

AGENCY/AFFILIATION: Campbell Soup Company		
DEPARTMENT:		
ADDRESS/CITY: 6200 Franklin Boulevard, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95824		
CONTACT(S)	TITLE	PHONE
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/22/91
SUBJECT: Site reconnaissance		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

Campbell Soup Company in Sacramento has petitioned to have its TSD status removed. The facility is working with DHS to implement this. A letter was sent to Mr. Ryan at DHS on November 20, 1990 requesting the nullification of the facility's TSD status. DHS told the facility that it would take six months for a response.

Campbell Soup Company's FAX number is (916) 421-6125.

The site reconnaissance was scheduled for June 6, 1991 at 12:00 p.m. Beards are not allowed in some areas of the facility. Appropriate work clothing is required for the site tour, such as boots and hard hat. Hearing and hair protection is to be provided.

CONTACT REPORT

AGENCY/AFFILIATION: Campbell Soup Company		
DEPARTMENT:		
ADDRESS/CITY: 6200 Franklin Boulevard, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/22/91
SUBJECT: Site Reconnaissance		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

Campbell Soup has petitioned to have its TSDF status removed. The facility is working with DHS to implement this. A letter was sent to Mr. Ryan of DHS on November 20, 1990 requesting the nullification of the facility's TSDF status. DHS told the facility that it would take six months for a response.

Campbell Soup's FAX number is (916) 421-6125.

The site reconnaissance was scheduled for June 6, 1991 at 12:00 p.m. Beards are not allowed in some areas of the facility. Appropriate work clothing is required for a tour (such as boots, hard hat). Hearing and hair protection will be provided.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Health Services		
DEPARTMENT:		
ADDRESS/CITY: 10151 Croyden Way, Suite 3, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California 95827		
CONTACT(S)	TITLE	PHONE
1. Eric Hong		(916) 855-7726
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 5/23/91
SUBJECT: Request for withdrawal of TSDF status		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

DHS issued a Hazardous Waste Facility Permit to the facility in 1987. Campbell Soup submitted a Closure Plan in the same year. DHS has approved the Closure Plan. In order to withdraw its TSDF status, Campbell Soup must conduct closure along the lines of the approved Closure Plan. Campbell Soup has not yet begun closure.

Campbell Soup had a still on site to burn virgin product to produce steam as part of its production. Campbell considered using this still to reuse the solvents on site. It probably was never used for that purpose because Campbell Soup would have had to obtain additional permits to use the still for that purpose and it did not want to bother with the complications.

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Ecology and Environment, Inc.		
Field Investigation Team (FIT)		
160 Spear Street, Suite 1400		
San Francisco, California 94105		
(415) 777-2811		
E & E PERSON(S) CONDUCTING INTERVIEW AND MAKING OBSERVATIONS:		
Juliet Shin and Kira Pyatt		
FACILITY REPRESENTATIVE(S):	TITLE:	PHONE:
Bob Cook	Environmental Engineer	(916) 395-5045
SITE NAME: Campbell Soup Company		DATE: 6/6/91
CITY/STATE: Sacramento, California		EPA ID#: CAD009198367

The following information was obtained during the interview:

Campbell Soup employees at the meeting were Bob Cook, Randy Foster, Tom Duwe, Mark Elliott, and Lynn Cissell.

The Campbell Soup site has a National Pollutant Discharge Elimination System (NPDES) permit that was issued to them on February 9, 1988 to allow for discharge of cooling water from the heat exchangers into the storm drains. Campbell Soup has requested withdrawal of its TSDF status. It sent a letter to DHS on November 20, 1990. Currently, Campbell Soup is still storing hazardous waste on site for over 90 days. Campbell Soup originally began storing over 90 days because it generated a small amount of waste and it wanted to accumulate a large amount of waste before hauling because it would save money. Now, Campbell Soup feels that it will be less problematic for the company if wastes are stored for less than 90 days and it withdraws its TSDF status.

The facility has one underground tank to store Stoddard solvent product. Campbell Soup will probably phase this out soon. This tank was installed in 1987.

Solvent-based wastes were generated from the can manufacturing department. A small amount of solvent-based waste was also generated in the machine shops. Campbell Soup ceased generating the solvent-based waste in early 1991. The facility also generates a

water-based paint residue that comes from cleanup. In addition, the facility used to generate a paint rinse water solution two to three years ago. All the solvents are stored in the hazardous waste area. This waste typically goes to Romic Chemical Corporation in Palo Alto for recycling. Very recently Campbell Soup switched to Romic. Prior to Romic, the waste was hauled by American Environmental Management Corporation (American Environmental). Approximately 55 55-gallon drums (2,500 gallons) of this waste accumulated since November 1990 at the site.

Waste oils are generated at the site from the maintenance of equipment. The waste oil is sent to a local recycler, Ramos Oil, in Sacramento.

The Campbell Soup building is filled with asbestos. The company knows where the asbestos is and removes it as needed (e.g., when piping needs to be removed or when there are modifications to the building). On-site bailers were recently removed along with some asbestos.

Spent forklift batteries are stored at the site. Campbell Soup used to have them hauled as waste, but now they sell them. The battery acid is not separated from the batteries. The batteries are stored in the hazardous waste shed. They are not stored for more than one year.

Campbell Soup attempted to recycle its solvents in 1987 or 1988 with an on-site still, which is located inside a building. The still caught on fire, and Campbell Soup subsequently ceased using it.

Campbell Soup listed tank bottom wastes in its Operation Plan. The tank bottom wastes refer to the facility's salt brine system where impurities from the salt that is brought in settles out. Campbell Soup does not feel that it needs to haul this as waste. Currently, the tank-bottom wastes are being stored in drums in the vicinity of the Hazardous Waste Storage Area. Romic is currently taking samples of this waste to see if it needs to be hauled as waste. American Environmental hauled this as waste in the past.

Five to 10 gallons per month of Vedeo Jet Ink is generated at the site. This ink contains methyl ethyl ketone (MEK) and is hauled by Romic Chemicals. The waste ink is stored in drums in the Hazardous Waste Storage Area. The ink waste is generated from the labeling process.

Caustic tanks were listed in Campbell Soup's Operation Plan. The caustic tanks are storage tanks for sodium hydroxide and chlorine which the facility receives in bulk. These tanks are inspected by OSHA.

The maximum capacity of the hazardous waste storage area is 200 55-gallon drums. This area covers approximately 50 feet x 60 feet. It is concrete-paved and surrounded by a 6 inch curb or berm.

A small amount of solvent waste was collected in drums in the parts storage area on site. This area could have contained up to six 55-gallon drums of solvents. Campbell Soup stopped storing drums in this area approximately three years ago.

The facility has been at the site since 1948. The site was probably just a field before Campbell Soup took it over. Campbell Soup's headquarters are in Camden, New Jersey.

There are six domestic/industrial wells on site. Additionally there are monitoring wells on site. The number of wells will probably be given in the report by American Environmental.

A diesel spill occurred at the site in 1990 near where diesel fuel is pumped because the pump was left on unguarded. American Environmental cleaned it up and Sacramento County Health Department approved the clean up. At most 20 to 30 gallons of diesel was spilled. The diesel spilled on to the soil. Another diesel spill occurred in 1987 at the site. Three hundred gallons of diesel ran into the bermed containment area around the diesel tanks. Bob Cook will give me a copy of a letter pertaining to this spill.

In approximately 1987, a leaky underground tank containing solvent-based enamel product initiated groundwater monitoring at the site. The information regarding this tank should be in the report prepared by American Environmental. There have been four or five underground product storage tanks that have been pulled out in the past and two that were buried. Bob Cook will get me a copy of the letter that discusses the closure of these product tanks.

There used to be three fenced transformer units that were located near the powerplant on site. These were owned by the Sacramento Municipal Utilities District and were removed approximately four years ago. Presently, there are light ballast transformers on site that contain small amounts of polychlorinated biphenyls (PCBs). The light ballasts containing the PCBs are collected in a 35-gallon drum which is stored in the hazardous waste shed. The PCBs are hauled to Kettleman Hills.

An insecticide, called Cardinal S.F.-1, is stored in the pesticide storage building on site and is used to fight insects at the facility. A maximum of 550 gallons of this insecticide could be stored in the pesticide storage building at the site. Methyl bromide is also stored in the pesticide storage building and is used for fumigation.

Campbell Soup has a permit to discharge to the sewer system. This permit was issued in 1987.

Campbell Soup does not have a certification by an engineer that the site has adequate containment for a 500-year flood.

The whole site is paved except for a 17-acre field.

There are 1,800 workers on site daily.

The following observations were made during the site reconnaissance visit:

There are a number of satellite collection areas for spent water-based and solvent-based enamel throughout the can manufacturing department on

site. These locations are shown on the facility map that will be made available to FIT once Bob Cook gets his supervisor's approval. FIT looked at one collection area. In this collection area, water-based enamel from the manufacturing of cans, is allowed to drip into a bucket. When this bucket is full, it is manually poured into an adjacent 55-gallon drum through a funnel. Once the drum is full, it is taken, by forklift, to the hazardous waste shed. According to Mr. Cook, all the on-site collection areas are run basically like this one.

The waste shed has been at the facility for 4 to 5 years. Before that the drums were stored outside on a concrete pad in the same general area. It is unknown if this area was fenced or bermed. Solvent-based and water-based enamel waste and waste oil are stored in this area. Empty drums are stored in this area for reuse. The waste oil and water-based solvent drums are reused. Romicon comes and pumps the drums until they are empty. The solvent-based enamel drums are hauled. Additionally, at the time of the FIT recon, there were three product drums of deodorized beef fat, one 35-gallon PCB drum, three empty drums, one 55-gallon drum of Vedeo Jet Ink and cleaner, and used batteries stored in this area. The used batteries are stored in a wooden container with a lid. All the drums are sealed and in good condition.

Asbestos is stored on site in a trailer near the hazardous waste shed.

There are two inactive tanks adjacent to the hazardous waste shed that are used to store caustics or solvents. Campbell Soup does not know what it will do with these tanks yet.

There are a great deal of sparrows in the hazardous waste shed.

At the time of the site reconnaissance, there were about five 55-gallon drums of salt brine immediately outside of the hazardous waste shed.

Alongside the hazardous waste shed, there is an empty drum storage area which covers approximately 150 square feet. Ultra violet enamel, oil, and grease drums are stored there. Capital Drum comes and picks up all the empty drums. This area is on a raised concrete pad, approximately 6 inches high, and is fenced on three sides. Used equipment is stored adjacent to the empty drum storage area in an area of approximately 300 square feet.

FIT observed the area where the 1990 diesel spill occurred. FIT observed where the cleanup occurred and noticed where some soil had been removed.

Campbell Soup owns approximately 17 acres of field adjacent to the hazardous waste shed, on the northwest corner of the facility. This field is not currently used. It was used historically to discharge tomato water.

FIT noticed a strong solvent odor outside of the container building.

There is a 4,000-gallon underground tank for holding product Stoddard

solvent located on one side of the container building. This tank was installed in 1987 or 1988. It is a fiber glass, double-walled tank. Adjacent to this are two tanks used to store product water-based enamel. There are 2-foot berms around these two tanks.

The Sacramento County Health Department inspects the site regularly (twice last year) because Campbell Soup has hazardous wastes on site.

Campbell Soup is bordered on the east by Franklin Boulevard, on the south by 47th Avenue, on the west by Western Pacific Railroad, and on the north by 39th Avenue.

CONTACT REPORT

AGENCY/AFFILIATION: Sacramento County		
DEPARTMENT: Environmental Health Department		
ADDRESS/CITY: Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Gloria Luma		(916) 386-6178
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 6/18/91
SUBJECT: County's involvement with site		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

The Sacramento County Health Department (County Health) issued Campbell Soup Company a Hazardous Materials Permit in July 1, 1990, because Campbell Soup Company exceeds the reportable quantities of hazardous waste at its site. County Health conducted an inspection at the site on May 24, 1990. At that time, County Health noted that hazardous waste drums were not labeled properly and that there were some hazardous waste drums without lids on site. County Health issued a permit to the facility in about 1988 for one 1,000-gallon underground product Stoddard solvent tank. County Health inspects the site once each year because of the underground tank.

CONTACT REPORT

AGENCY/AFFILIATION: Campbell Soup Company		
DEPARTMENT:		
ADDRESS/CITY: 6200 Franklin Boulevard, Sacramento		
COUNTY/STATE/ZIP: Sacramento, California		
CONTACT(S)	TITLE	PHONE
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
E & E PERSON MAKING CONTACT: Juliet Shin		DATE: 6/19/91
SUBJECT: Operations at the site		
SITE NAME: Campbell Soup Company		EPA ID#: CAD009198367

The parts storage area was located in the plant storeroom at the site. The container department store room located on the facility map sent to FIT is used for small quantity storage of unopened 55-gallon drums of enamels and oils. The container department storage area #1 is used to store bulk quantities of enamels. This area consists of a 1,000-gallon, above-ground tank that is probably bermed. This tank may not be in use anymore. The production chemical storeroom on the facility map was used to store dry chemicals. It is probably not used any longer because Campbell Soup Company switched over to liquid chemicals in bulk quantities. This area is fenced and locked, and is located on the fourth floor of a building.

The caustic tanks on site are located immediately south of W-35 on the map, which is in the area of the garbage dock room.

Two underground solvent tanks used to be located near the current underground solvent tank on site. The other two underground solvent tanks were located roughly midway between W-8A and W-20 on the facility map.

APPENDIX B

PHOTODOCUMENTATION

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:30 PM

DIRECTION:

east

WEATHER:

sunny and warm

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

This is the facility's hazardous waste shed, located in the western portion of the site

DATE: June 6, 1991

TIME 1:30 PM

DIRECTION:

east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

Inside of the facility's hazardous waste shed.

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:45 PM

DIRECTION:

north

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

This is the empty drum storage area that is located adjacent to the hazardous waste shed. It is fenced on three sides.

DATE: June 6, 1991

TIME 1:47 PM

DIRECTION:

north

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

Used equipment is stored adjacent to the empty drum storage area in an area covering approximately 300 square feet.

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:55 PM

DIRECTION:

north

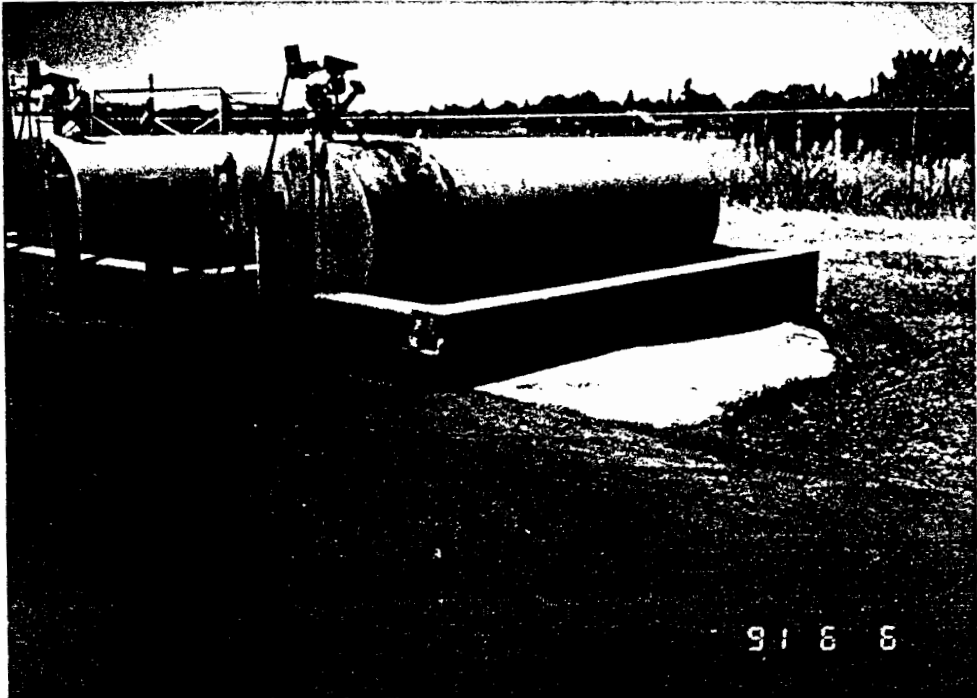
WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



Two diesel tanks used to fuel facility's equipment. Note the trenched area of excavated soil alongside the tanks. This was the result of cleanup action for a diesel spill.

DATE: June 6, 1991

TIME 2:00 PM

DIRECTION:

east

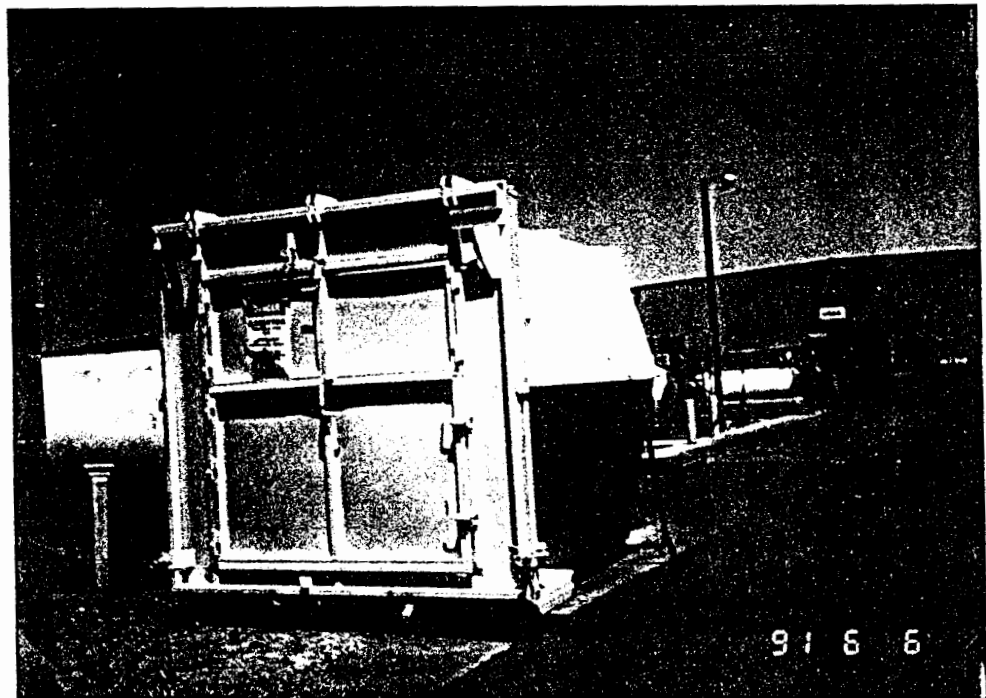
WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



The facility's asbestos containment. Some portions of the Campbell Soup Company still have asbestos in them. When pipes need to be replaced, the asbestos is removed with them and stored in the asbestos containment area until hauled off site.

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 2:15 PM

DIRECTION:

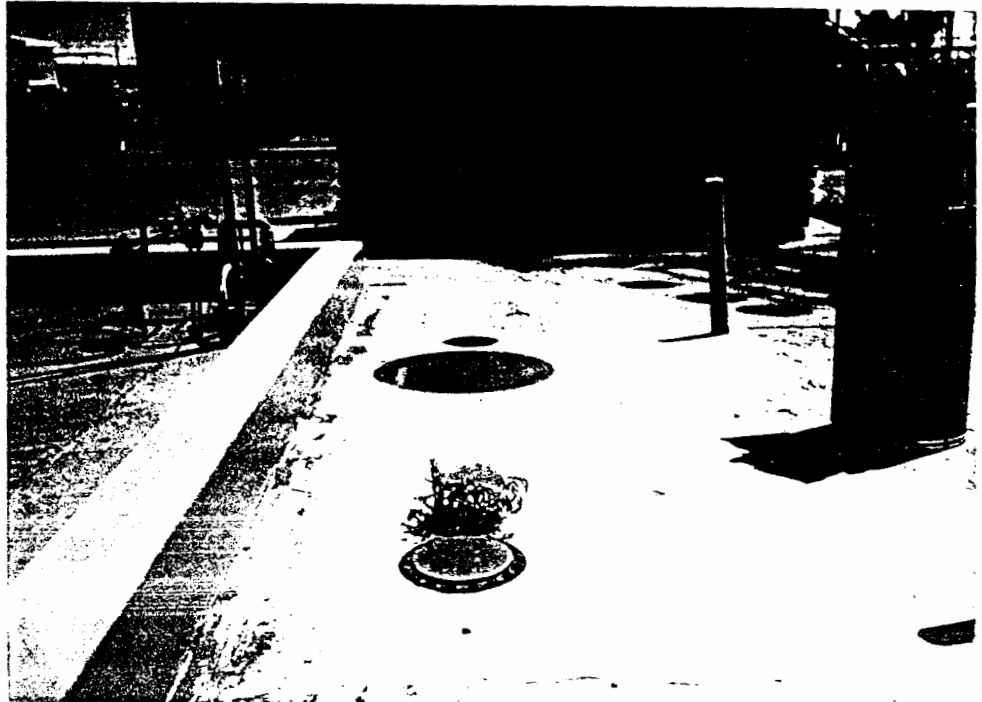
east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

The location of the underground product stoddard solvent tank.

DATE: June 6, 1991

TIME 2:15 PM

DIRECTION:

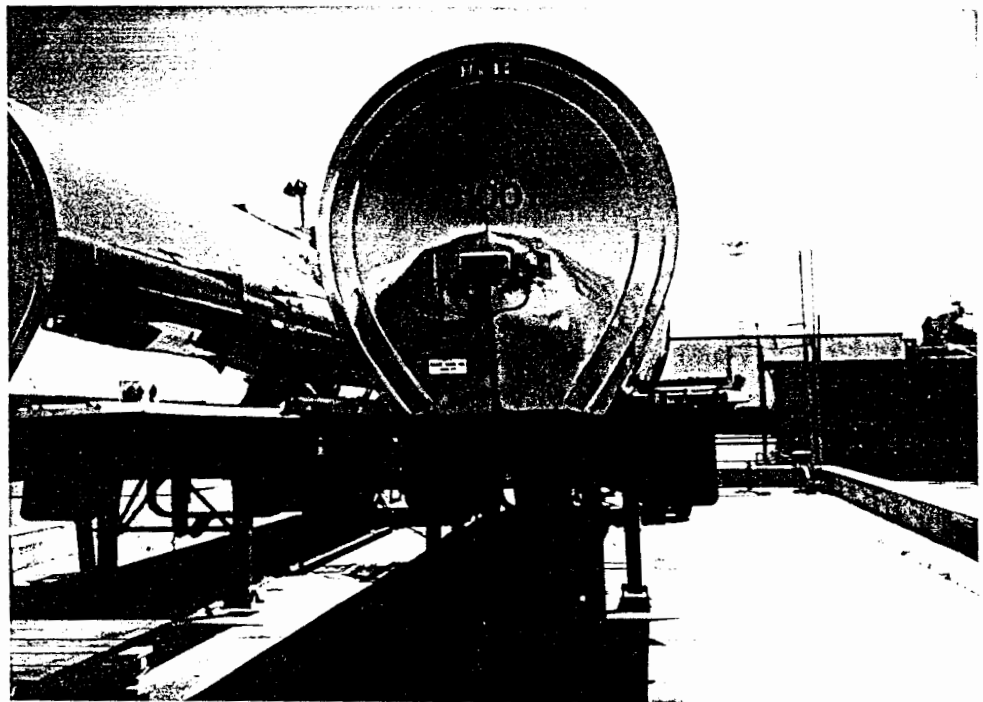
east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

Two tanks used to store product water-based enamel. A berm surrounds these tanks.